

Conversation Contents

Questions Re Friday

Lori LeBlanc <lori@lorileblancllc.com>

From: Lori LeBlanc <lori@lorileblancllc.com>
Sent: Mon Mar 05 2018 09:28:06 GMT-0700 (MST)
To: Scott Angelle <scott.angelle@bsee.gov>
CC: <preston.beard@bsee.gov>
Subject: Questions Re Friday

Director Angelle,

A few questions about the LMOGA/OOC this Friday. Folks are asking if we have an agenda. Besides having you and your staff as presenting a "state of the agency," do you have subject matter items that we can incorporate into an agenda?

The meeting begins at 10am; however we have not indicated an end time. Is 2 hours enough time for you and your staff to make your presentations and include Q&A?

Finally, can we share a copy of the presentation to our meeting attendees?

Feel free to call me if you would like to discuss further. Thank you again for participating in our meeting.

Best regards,

Lori LeBlanc
LMOGA
985.209.7932

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RE: Secretary Zinke Moves Forward to Improve Safety Offshore

Attachments:

/31. RE: Secretary Zinke Moves Forward to Improve Safety Offshore/4.1
savethedate_executivenight_april2018.pdf

Holly Hopkins <hopkinsh@api.org>

From: Holly Hopkins <hopkinsh@api.org>
Sent: Wed Mar 07 2018 10:28:42 GMT-0700 (MST)
To: "scott.angelle@bsee.gov" <scott.angelle@bsee.gov>, "Tom Lillie (Thomas.Lillie@bsee.gov)" <Thomas.Lillie@bsee.gov>, "preston.beard@bsee.gov" <preston.beard@bsee.gov>
CC: "Eileen Angelico (Eileen.Angelico@bsee.gov)" <Eileen.Angelico@bsee.gov>
Subject: RE: Secretary Zinke Moves Forward to Improve Safety Offshore

Scott, thanks so much for the call today. As I mentioned I'd like to visit again when you are back in Washington. Tom (or Preston), could you please find some time to do that.

Thanks,
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From: Holly Hopkins
Sent: Tuesday, March 06, 2018 5:34 PM
To: 'scott.angelle@bsee.gov' <scott.angelle@bsee.gov>
Cc: Eileen Angelico (Eileen.Angelico@bsee.gov) <Eileen.Angelico@bsee.gov>; Tom Lillie (Thomas.Lillie@bsee.gov) <Thomas.Lillie@bsee.gov>
Subject: FW: Secretary Zinke Moves Forward to Improve Safety Offshore

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From: "Funes, Jason" <jason_funes@ios.doi.gov>
Date: March 6, 2018 at 4:22:54 PM EST
To: undisclosed-recipients;
Subject: Fwd: Secretary Zinke Moves Forward to Improve Safety Offshore

Attached is more information regarding the 6 BSEE Safety Improvement Initiatives announced below....

Making American Energy Safe and Amazing again...



OFFICE OF THE SECRETARY

**U.S. Department
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News Release

Date: March 6, 2018

Contacts: Interior_Press@ios.doi.gov

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Scott Angelle <scott.angelle@bsee.gov>

From: Scott Angelle <scott.angelle@bsee.gov>
Sent: Wed Mar 07 2018 12:31:32 GMT-0700 (MST)
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"Tom Lillie (Thomas.Lillie@bsee.gov)"
CC: <Thomas.Lillie@bsee.gov>, "preston.beard@bsee.gov"
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Sent: Wed Mar 07 2018 12:51:51 GMT-0700 (MST)
To: Scott Angelle <scott.angelle@bsee.gov>
CC: Holly Hopkins <hopkinsh@api.org>, "preston.beard@bsee.gov" <preston.beard@bsee.gov>, "Eileen Angelico (Eileen.Angelico@bsee.gov)" <Eileen.Angelico@bsee.gov>
Subject: Re: Secretary Zinke Moves Forward to Improve Safety Offshore

All set for April 11 at 11:00 in room 5411 of MIB. Tom

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(202) 208-6286
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To: "Lillie, Thomas" <thomas.lillie@bsee.gov>, Scott Angelle <scott.angelle@bsee.gov>
CC: "preston.beard@bsee.gov" <preston.beard@bsee.gov>, "Eileen Angelico (Eileen.Angelico@bsee.gov)" <Eileen.Angelico@bsee.gov>
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To: Holly Hopkins <hopkinsh@api.org>
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Great thanks

----- Original message -----

From: "Lillie, Thomas" <thomas.lillie@bsee.gov>

Date: 3/7/18 3:11 PM (GMT-05:00)

To: Holly Hopkins <hopkinsh@api.org>

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SAVE THE DATE

FOR

PLANO'S 2018 EXECUTIVE NIGHT

FRENCH QUARTER FESTIVAL EVE

WEDNESDAY, APRIL 11, 2018

LE PETIT THEATRE DU VIEUX CARRE

616 ST. PETER STREET

NEW ORLEANS, LA

FEATURED SPEAKER

SCOTT A. ANGELLE

DIRECTOR

BUREAU OF SAFETY &

ENVIRONMENTAL ENFORCEMENT

COCKTAIL RECEPTION

TO FOLLOW NEXT DOOR

AT

DICKIE BRENNAN'S TABLEAU

ADDITIONAL DETAILS FORTHCOMING

WWW.PLANOWEB.ORG

Conversation Contents

Offshore Operators Committee - at MIB

preston.beard@bsee.gov

From: preston.beard@bsee.gov
Sent: Tue Apr 10 2018 08:19:41 GMT-0600 (MDT)
To: preston.beard@bsee.gov, eileen.angelico@bsee.gov, greg@southworthconsulting.com
Subject: Offshore Operators Committee - at MIB

Good morning Greg,

Unfortunately, BSEE Director Angelle will not be available to meet with OOC April 12, 2018. He had an (b) (6)

Keep in touch if you need anything from our side.

We appreciate your understanding of the need to cancel and we look forward to rescheduling.

Sincerely,

Preston Beard

Offshore Operators Committee - at MIB

OOC will have a few people to meet with the Director on April 12. As of now it will be the following:

- Greg Southworth, OOC
- Joe Savoy, Wild Well
- Either Connie Goers or Mike Macauley, Arena Offshore
- Cheryl Powell, Enven
- Amber Tierce, Chevron
- Mike Fairburn, Shell (tentative).

Thanks!

Greg Southworth

Please "pencil us in" for April 12, but I will have to confirm with the OOC members planning to attend. They were all planning to attend NOIA from April 11-13 so I want to make sure they are willing to breakaway from the NOIA meeting.

Original request later changed to 12 April: I am writing to see if Director Angelle has some time on his calendar on April 10. Myself and 5 OOC member reps will be in DC for the NOIA Spring meeting. If the Director has time we would like to talk with him for 30-60 minutes. I can provide an agenda soon but wanted to check his availability first.

Please let me know. Thanks!

Greg Southworth

Associate Director

Offshore Operators Committee

When Thu Apr 12, 2018 3pm – 4pm Eastern Time

Where 5056 ([map](#))

Video call https://plus.google.com/hangouts/_/doi.gov/scott-angelle

Who

- scott.angelle@bsee.gov - organizer
- thomas.lillie@bsee.gov - creator
- eileen.angelico@bsee.gov
- preston.beard@bsee.gov
- greg@southworthconsulting.com

Greg Southworth <greg@southworthconsulting.com>

From: Greg Southworth <greg@southworthconsulting.com>
Sent: Tue Apr 10 2018 10:26:10 GMT-0600 (MDT)
To: "preston.beard@bsee.gov" <preston.beard@bsee.gov>, "eileen.angelico@bsee.gov" <eileen.angelico@bsee.gov>
Subject: [EXTERNAL] Re: Offshore Operators Committee - at MIB

Preston -

Thanks for letting us know and please (b) (6)

Thank you.

Greg Southworth
Associate Director
Offshore Operators Committee

From: preston.beard@bsee.gov
Sent: Tuesday, April 10, 2018 10:19 AM
Subject: Offshore Operators Committee - at MIB
To: <preston.beard@bsee.gov>, <eileen.angelico@bsee.gov>, <greg@southworthconsulting.com>

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Associate Director

Offshore Operators Committee

When Thu Apr 12, 2018 3pm – 4pm Eastern Time

Where 5056 ([map](#))

Video call https://plus.google.com/hangouts/_/doi.gov/scott-angelle

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- thomas.lillie@bsee.gov - creator
- eileen.angelico@bsee.gov
- preston.beard@bsee.gov
- greg@southworthconsulting.com

Conversation Contents

[EXTERNAL] Fwd: News Release: LMOGA Responds to Secretary Zinke's Announcement on Royalty Rates

Lori LeBlanc <lori@lorileblancllc.com>

From: Lori LeBlanc <lori@lorileblancllc.com>
Sent: Wed Apr 18 2018 10:58:28 GMT-0600 (MDT)
To: Scott Angelle <scott.angelle@bsee.gov>, <preston.beard@bsee.gov>
Subject: [EXTERNAL] Fwd: News Release: LMOGA Responds to Secretary Zinke's Announcement on Royalty Rates

----- Original Message -----

From: Ashley Cain <ashley.cain@lmoga.com>
To: "lori@lorileblancllc.com" <lori@lorileblancllc.com>
Date: April 18, 2018 at 12:42 PM
Subject: News Release: LMOGA Responds to Secretary Zinke's Announcement on Royalty Rates

[Web version](#) | [Forward](#)



"Navigating Today's Challenging Energy Environment"

LMOGA NEWS ALERT

LMOGA Responds to Secretary Zinke's Announcement on Royalty Rates

BATON ROUGE, LA --- LMOGA President Chris John made the following statement regarding the recent announcement on royalty rates:

"LMOGA is surprised and disappointed by yesterday's announcement from U.S. Department

of Interior Secretary Ryan Zinke to maintain existing offshore royalty rates, especially in the deepwater Gulf of Mexico. LMOGA appreciates DOI's recent efforts around regulatory reforms; however, we believe the federal government needs to do more to attract industry capital investments in the Gulf of Mexico in order to remain competitive as compared to other basins around the world. The declining interest in recent Gulf of Mexico offshore lease sales is evidence that more needs to be done to attract new investments, create more jobs and increase revenues to the federal government. According to federal lease sale data compiled by economist Dr. Loren Scott, lease sale revenues in the Central Gulf demonstrated a decline from 2014 to 2017 from \$851 million to \$274 million, or 32%; and participation by companies during that same period declined from 50 firms to 28 firms, or 56%.

The recent increase in America's energy production, specifically in the Gulf of Mexico, is a result of the oil and gas industry's capital investments made several years ago. This current level of production and the federal revenue generated from our offshore waters is not sustainable for the long-term without an increase in industry investments today which can be supported by a reduced royalty rate. In addition, increasing investments in the Gulf will result in an increase in critical offshore revenues towards Louisiana's coastal restoration and protection efforts.

LMOGA is encouraged by the Secretary's statement that the Agency will heed the recommendation of the Royalty Policy Committee to proceed with a study on international onshore and offshore data to further support the need for royalty relief. As such, we urge DOI to aggressively initiate this study to advance America's energy dominance well into the future."

###

Louisiana Mid-Continent Oil
and Gas Association

730 North Blvd.
Baton Rouge, LA 70802
P: 225-387-3205
F: 225-344-5502
Unsubscribe



Conversation Contents

[EXTERNAL] Business Report Article

Lori LeBlanc <lori@lorileblancllc.com>

From: Lori LeBlanc <lori@lorileblancllc.com>
Sent: Tue May 15 2018 08:29:18 GMT-0600 (MDT)
To: Scott Angelle <scott.angelle@bsee.gov>, <preston.beard@bsee.gov>, <eileen.angelico@bsee.gov>
Subject: [EXTERNAL] Business Report Article

FYI...

A new federal posture seeks to lower barriers to offshore exploration and production

<https://www.businessreport.com/business/new-federal-posture-seeks-lower-barriers-offshore-exploration-production>

-- Lori

Eileen Angelico <eileen.angelico@bsee.gov>

From: Eileen Angelico <eileen.angelico@bsee.gov>
Sent: Tue May 15 2018 08:34:13 GMT-0600 (MDT)
To: Lori LeBlanc <lori@lorileblancllc.com>
CC: Scott Angelle <scott.angelle@bsee.gov>, preston.beard@bsee.gov, Gregory Julian <gregory.julian@bsee.gov>
Subject: Re: [EXTERNAL] Business Report Article

Thanks Lori.

I was just reading article through a Google Alert as your email came in.

Appreciate you sharing it.

Eileen

Sent from my iPhone

On May 15, 2018, at 9:29 AM, Lori LeBlanc <lori@lorileblancllc.com> wrote:

FYI...

A new federal posture seeks to lower barriers to offshore exploration and production

<https://www.businessreport.com/business/new-federal-posture-seeks-lower-barriers-offshore-exploration-production>

-- Lori

Conversation Contents

Re: [EXTERNAL] Time for a Phone Call on Friday to Discuss Incident Reporting?

Scott Angelle <scott.angelle@bsee.gov>

From: Scott Angelle <scott.angelle@bsee.gov>
Sent: Wed May 23 2018 08:11:46 GMT-0600 (MDT)
To: Joe Leimkuhler <jml@llog.com>, Preston Beard <preston.beard@bsee.gov>
Subject: Re: [EXTERNAL] Time for a Phone Call on Friday to Discuss Incident Reporting?

Sure. Happy to discuss. Just to be clear bsee's position on this issue is not a function of industry support. Knowing how all stakeholders,(industry, ngos, congress, etc) feel is often helpful. Preston please schedule call

Sent from my iPhone

On May 23, 2018, at 8:48 AM, Joe Leimkuhler <jml@llog.com> wrote:

Scott

I hope all is well with you. Since we last met in DC and discussed the incident reporting programs at BSEE and how they compare to the FAA/Airlines model I have made quite a bit of progress getting the industry trade groups aligned around the idea. I am at a conference with Roland Moreau (Roland helps run the BTS incident reporting program) and have been discussing with Roland how the BTS program could be adapted and enhanced to more closely resemble the FAA model. I have become convinced our greatest chance for success is to develop a more hybrid reporting model that does not involve dropping the BTS program or starting a new program from scratch but to energize and modify the current programs.

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My Friday is pretty open from 7 AM to 2 pm. Are you free for 5-10 mins to discuss.

Joe

Joseph Leimkuhler
Vice President – Drilling, LLOG Exploration L.L.C.

<image001.png>

1001 Ochsner Blvd., Suite 200
Covington, Louisiana 70433
(985) 801-4300

"Beard, Preston" <preston.beard@bsee.gov>

From: "Beard, Preston" <preston.beard@bsee.gov>
Sent: Wed May 23 2018 08:40:26 GMT-0600 (MDT)
To: Scott Angelle <scott.angelle@bsee.gov>
CC: Joe Leimkuhler <jml@llog.com>
Subject: Re: [EXTERNAL] Time for a Phone Call on Friday to Discuss Incident Reporting?

8:30am EST on Friday is scheduled for the call. Joe, please let us know the best number to reach you. Thanks!

On Wed, May 23, 2018 at 10:11 AM, Scott Angelle <scott.angelle@bsee.gov> wrote:

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<image001.png>

[1001 Ochsner Blvd., Suite 200](#)

[Covington, Louisiana 70433](#)

(985) 801-4300

--

Preston Beard
Advisor, Office of the Director

Bureau of Safety and Environmental Enforcement
(202) 208-3976 (o)
(571) 585-7001 (c)
preston.beard@bsee.gov

Joe Leimkuhler <jml@llog.com>

From: Joe Leimkuhler <jml@llog.com>
Sent: Wed May 23 2018 08:45:30 GMT-0600 (MDT)
To: "Beard, Preston" <preston.beard@bsee.gov>
Subject: Re: [EXTERNAL] Time for a Phone Call on Friday to Discuss Incident Reporting?

Best number is 985-789-8714 Sent from my Verizon, Samsung Galaxy smartphone -----
Original message ----- From: "Beard, Preston" <preston.beard@bsee.gov> Date: 5/23/18 9:40 AM (GMT-06:00) To: Scott Angelle <scott.angelle@bsee.gov> Cc: Joe Leimkuhler <jml@llog.com> Subject: Re: [EXTERNAL] Time for a Phone Call on Friday to Discuss Incident Reporting? 8:30am EST on Friday is scheduled for the call. Joe, please let us know the best number to reach you. Thanks! On Wed, May 23, 2018 at 10:11 AM, Scott Angelle <scott.angelle@bsee.gov> wrote: Sure. Happy to discuss. Just to be clear bsee's position on this issue is not a function of industry support. Knowing how all stakeholders, (industry, ngos, congress, etc) feel is often helpful. Preston please schedule call Sent from my iPhone On May 23, 2018, at 8:48 AM, Joe Leimkuhler <jml@llog.com> wrote: Scott I hope all is well with you. Since we last met in DC and discussed the incident reporting programs at BSEE and how they compare to the FAA/Airlines model I have made quite a bit of progress getting the industry trade groups aligned around the idea. I am at a conference with Roland Moreau (Roland helps run the BTS incident reporting program) and have been discussing with Roland how the BTS program could be adapted and enhanced to more closely resemble the FAA model. I have become convinced our greatest chance for success is to develop a more hybrid reporting model that does not involve dropping the BTS program or starting a new program from scratch but to energize and modify the current programs. One aspect that is still needed is the "protections from punitive action for the staff by the companies involved (operators, drilling contractors, BSEE etc). For that we still need action by congress. I want to start making that push but want to discuss with you the end in mind, which is to add that provision to the current programs and then make some modifications to obtain the same goals. In our prior meeting you mentioned that for BSEE to support such an effort I needed to ensure alignment from all the industry trade groups. I would like to update you on that progress. My Friday is pretty open from 7 AM to 2 pm. Are you free for 5-10 mins to discuss. Joe Joseph Leimkuhler Vice President - Drilling, LLOG Exploration L.L.C. 1001 Ochsner Blvd., Suite 200 Covington, Louisiana 70433 (985) 801-4300 -- Preston Beard Advisor, Office of the Director Bureau of Safety and Environmental Enforcement (202) 208-3976 (o) (571) 585-7001 (c) preston.beard@bsee.gov <mailto:preston.beard@bsee.gov>

Scott Angelle <scott.angelle@bsee.gov>

From: Scott Angelle <scott.angelle@bsee.gov>
Sent: Thu May 24 2018 03:17:12 GMT-0600 (MDT)
To: Preston Beard <preston.beard@bsee.gov>
Subject: Fwd: [EXTERNAL] Time for a Phone Call on Friday to Discuss Incident Reporting?

Please acknowledge
Sent from my iPhone

Begin forwarded message:

From: Scott Angelle <scott.angelle@bsee.gov>
Date: May 23, 2018 at 10:11:46 AM EDT
To: Joe Leimkuhler <jml@llog.com>, Preston Beard <preston.beard@bsee.gov>
Subject: Re: [EXTERNAL] Time for a Phone Call on Friday to Discuss Incident Reporting?

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Vice President – Drilling, LLOG Exploration L.L.C.

<image001.png>

1001 Ochsner Blvd., Suite 200
Covington, Louisiana 70433
(985) 801-4300

"Beard, Preston" <preston.beard@bsee.gov>

From: "Beard, Preston" <preston.beard@bsee.gov>

Sent: Thu May 24 2018 11:47:17 GMT-0600 (MDT)
To: Joe Leimkuhler <jml@llog.com>
Subject: Re: [EXTERNAL] Time for a Phone Call on Friday to Discuss Incident Reporting?

Can we move this call to 12:30 EST? Sorry, we got tied up with something

On Thu, May 24, 2018 at 5:17 AM, Scott Angelle <scott.angelle@bsee.gov> wrote:

Please acknowledge
Sent from my iPhone

Begin forwarded message:

From: Scott Angelle <scott.angelle@bsee.gov>
Date: May 23, 2018 at 10:11:46 AM EDT
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Bureau of Safety and Environmental Enforcement
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preston.beard@bsee.gov

Joe Leimkuhler <jml@llog.com>

From: Joe Leimkuhler <jml@llog.com>
Sent: Thu May 24 2018 13:13:00 GMT-0600 (MDT)
To: "Beard, Preston" <preston.beard@bsee.gov>
Subject: Re: [EXTERNAL] Time for a Phone Call on Friday to Discuss Incident Reporting?

Not a problem will wait for Director Angelle to call. Sent from my Verizon, Samsung Galaxy smartphone ----- Original message ----- From: "Beard, Preston" <preston.beard@bsee.gov> Date: 5/24/18 12:47 PM (GMT-06:00) To: Joe Leimkuhler <jml@llog.com> Subject: Re: [EXTERNAL] Time for a Phone Call on Friday to Discuss Incident Reporting? Can we move this call to 12:30 EST? Sorry, we got tied up with something On Thu, May 24, 2018 at 5:17 AM, Scott Angelle <scott.angelle@bsee.gov> wrote: Please acknowledge Sent from my iPhone Begin forwarded message: From: Scott Angelle <scott.angelle@bsee.gov> Date: May 23, 2018 at 10:11:46 AM EDT To: Joe Leimkuhler <jml@llog.com>, Preston Beard <preston.beard@bsee.gov> Subject: Re: [EXTERNAL] Time for a Phone Call on Friday to Discuss Incident Reporting? Sure. Happy to discuss. Just to be clear bsee's position on this issue is not a function of industry support. Knowing how all stakeholders, (industry, ngos, congress, etc) feel is often helpful. Preston please schedule call Sent from my iPhone On May 23, 2018, at 8:48 AM, Joe Leimkuhler <jml@llog.com> wrote: Scott I hope all is well with you. Since we last met in DC and discussed the incident reporting programs at BSEE and how they compare to the FAA/Airlines model I have made quite a bit of progress getting the industry trade groups aligned around the idea. I am at a conference with Roland Moreau (Roland helps run the BTS incident reporting program) and have been discussing with Roland how the BTS program could be adapted and enhanced to more closely resemble the FAA model. I have become convinced our greatest chance for success is to develop a more hybrid reporting model that does not involve dropping the BTS program or starting a new program from scratch but to energize and modify the current programs. One aspect that is still needed is the "protections from punitive action for the staff by the companies involved (operators, drilling contractors, BSEE etc). For that we still need action by congress. I want to start making that push but want to discuss with you the end in mind, which is to add that provision to the current programs and then make some modifications to obtain the same goals. In our prior meeting you mentioned that for BSEE to support such an effort I needed to ensure alignment from all the industry trade groups. I would like to update you on that progress. My Friday is pretty open from 7 AM to 2 pm. Are you free for 5-10 mins to discuss. Joe Joseph Leimkuhler Vice President - Drilling, LLOG Exploration L.L.C. 1001 Ochsner Blvd., Suite 200 Covington, Louisiana 70433 (985) 801-4300 -- Preston Beard Advisor, Office of the Director Bureau of Safety and Environmental Enforcement (202) 208-3976 (o) (571) 585-7001 (c) preston.beard@bsee.gov <mailto:preston.beard@bsee.gov>

Conversation Contents

Speaking Invitations for Deepwater Intervention Forum and Deepwater Technology Symposium

Attachments:

/26. Speaking Invitations for Deepwater Intervention Forum and Deepwater Technology Symposium/2.1 image001.png

"Angelico, Eileen" <eileen.angelico@bsee.gov>

From: "Angelico, Eileen" <eileen.angelico@bsee.gov>
Sent: Tue Jun 05 2018 13:26:23 GMT-0600 (MDT)
To: Joe Leimkuhler <Jml@llog.com>
CC: "Beard, Preston" <preston.beard@bsee.gov>, "Mcbrady, Monica" <monica.mcbrady@bsee.gov>
Subject: Speaking Invitations for Deepwater Intervention Forum and Deepwater Technology Symposium

Good afternoon Joe,

We completed our review of BSEE Director Scott Angelle's calendar and availability for participation in external events. Director Angelle is available to speak at both the Deepwater Intervention Forum in Galveston, TX and the Deepwater Technology Symposium in New Orleans, LA.

Per your March 2018 email highlighting the available time slots at the Deepwater Intervention Forum, the speaking time slot of the keynote address on the first day of the Forum looks to be the best scheduling option. Please let me know as soon as possible if the available speaking time slots have changed and we will need to adjust our schedule.

Per our telephone discussion in May 2018 re: the Deepwater Technology Symposium, the speaking time slot of the keynote luncheon on Tuesday, August 28 looks to be the best scheduling option. Please let me know as soon as possible if the available speaking time slots have changed and we will need to adjust our schedule.

For our planning purposes, we will need the following information for each of the speaking engagements. Please submit the information at your earliest convenience

Event Title and Organizer:

Date of Event:

Location:

Topic:

Length and Format of Remarks:

Open or Closed Press:

Nature of Press and Expected Coverage (e.g. trade press, local reporters, national media, etc.):

Audience: (expected count and representatives of ?)

Point of Contact for Event:

We look forward to successful participation. We will be talking more as the events get closer. Please do not hesitate to contact me if you have any questions or need additional information.

Sincerely,

Eileen

Eileen P. Angelico, APR
Chief, Office of Public Affairs
Bureau of Safety and Environmental Enforcement
(202) 208-7746 office
(504) 654-7840 mobile

Joe Leimkuhler <jml@llog.com>

From: Joe Leimkuhler <jml@llog.com>
Sent: Wed Jun 06 2018 07:45:59 GMT-0600 (MDT)
To: "Angelico, Eileen" <eileen.angelico@bsee.gov>
"Beard, Preston" <preston.beard@bsee.gov>, "Mcbrady, Monica"
CC: <monica.mcbrady@bsee.gov>, "Bob Meltz
(RMeltz@chevron.com)" <RMeltz@chevron.com>
Subject: [EXTERNAL] RE: Speaking Invitations for Deepwater Intervention
Forum and Deepwater Technology Symposium
Attachments: image001.png

Good Morning Eileen. I am quite confident that we can move Director Angelle from the 4 PM Plenary Session to the noon Keynote spot on the first day of the symposium Tuesday August 28th but I need to confirm the other speaker (locally based) can move to the 4 PM slot.

All the other info you requested is below. Let me know if you have any questions. As soon as I can confirm that the other speaker can make the switch I will let you know later today.

Joe

Joseph Leimkuhler
Vice President – Drilling, LLOG Exploration L.L.C.

Description: LLOG_RGB-
150dpi Transparent small

1001 Ochsner Blvd., Suite 200
Covington, Louisiana 70433
Office - (985) 801-4398
Cell - (b) (6)

Event Title and Organizer: 2018 Deepwater Technical Symposium, Sponsored by Society of Petroleum Engineers (SPE) , American Association of Drilling Engineers (AADE) , and New Orleans Geological Society (NOGS) <http://www.deepwaternola.org/>

Date of Event: Tuesday August 28th – Lunch Keynote Speaker (Time TBD)

Location: New Orleans Downtown Marriott at the Convention Center, 859 Convention Center Blvd., New Orleans, LA 70130 Phone: (504) 613-2888

Topic: Symposium desires Director Angelle to cover any issue or area of the offshore OCS business, (Safety, permitting, anticipated regulatory changes, upcoming programs/initiatives etc.) that the audience should be aware of.

Length and Format of Remarks: 30-40 Minute Talk followed by 10-15 mins of Q&A from the audience. If Director Angel prefers to not do the open Q&A that is OK.

Open or Closed Press: Open to the Press, but no Free or complimentary media passes are given. Prior symposiums have provided passes to "media" in exchange for internet and website promotion of the conference. (OCSBBS.com).

Nature of Press and Expected Coverage (e.g. trade press, local reporters, national media, etc.): Prior coverage consisted of articles in trade magazines, "Offshore, World Oil, etc. If any specific media have made requests to attend and are known or expected that info can be provided once known.
Audience: (expected count and representatives of ?) Conference Attendance should be in the 350-400 range with ~200-250 for the Keynote (Lunch) and Plenary sessions. Representatives are primarily from the Oil and Gas sectors, Service Company and Operator staff and Students from LA and TX based universities.
Point of Contact for Event: Joe Leimkuhler, Vice President – Drilling, LLOG Exploration
JML@LLOG.com 985-801-4398

From: Angelico, Eileen [<mailto:eileen.angelico@bsee.gov>]
Sent: Tuesday, June 05, 2018 2:26 PM
To: Joe Leimkuhler
Cc: Beard, Preston; Mcbrady, Monica
Subject: Speaking Invitations for Deepwater Intervention Forum and Deepwater Technology Symposium

Good afternoon Joe,

We completed our review of BSEE Director Scott Angelle's calendar and availability for participation in external events. Director Angelle is available to speak at both the Deepwater Intervention Forum in Galveston, TX and the Deepwater Technology Symposium in New Orleans, LA.

Per your March 2018 email highlighting the available time slots at the Deepwater Intervention Forum, the speaking time slot of the keynote address on the first day of the Forum looks to be the best scheduling option. Please let me know as soon as possible if the available speaking time slots have changed and we will need to adjust our schedule.

Per our telephone discussion in May 2018 re: the Deepwater Technology Symposium, the speaking time slot of the keynote luncheon on Tuesday, August 28 looks to be the best scheduling option. Please let me know as soon as possible if the available speaking time slots have changed and we will need to adjust our schedule.

For our planning purposes, we will need the following information for each of the speaking engagements. Please submit the information at your earliest convenience

Event Title and Organizer:
Date of Event:
Location:
Topic:
Length and Format of Remarks:
Open or Closed Press:
Nature of Press and Expected Coverage (e.g. trade press, local reporters, national media, etc.):
Audience: (expected count and representatives of ?)
Point of Contact for Event:

We look forward to successful participation. We will be talking more as the events get closer. Please do not hesitate to contact me if you have any questions or need additional information.

Sincerely,

Eileen

Eileen P. Angelico, APR
Chief, Office of Public Affairs
Bureau of Safety and Environmental Enforcement
(202) 208-7746 office
(504) 654-7840 mobile

Eileen Angelico <eileen.angelico@bsee.gov>

From: Eileen Angelico <eileen.angelico@bsee.gov>
Sent: Wed Jun 06 2018 07:51:41 GMT-0600 (MDT)
To: Joe Leimkuhler <jml@llog.com>
CC: "Beard, Preston" <preston.beard@bsee.gov>, "Mcbrady, Monica" <monica.mcbrady@bsee.gov>, "Bob Meltz (RMeltz@chevron.com)" <RMeltz@chevron.com>
Subject: Re: [EXTERNAL] RE: Speaking Invitations for Deepwater Intervention Forum and Deepwater Technology Symposium

Thank you Joe for your quick response.

We can accommodate the 4pm slot on Aug. 28. I initially understood that the 2nd option was Aug. 29 which would not have been conducive for the schedule.

So if you want to confirm that and leave it as scheduled, that works for us.

Let me know about the Deepwater Intervention Forum as well if you can.

It is always a pleasure to work with you.

Thanks,

Eileen

Sent from my iPhone

On Jun 6, 2018, at 9:45 AM, Joe Leimkuhler <jml@llog.com> wrote:

Good Morning Eileen. I am quite confident that we can move Director Angelle from the 4 PM Plenary Session to the noon Keynote spot on the first day of the symposium Tuesday August 28th but I need to confirm the other speaker (locally based) can move to the 4 PM slot.

All the other info you requested is below. Let me know if you have any questions. As soon as I can confirm that the other speaker can make the switch I will let you know later today.

Joe

Joseph Leimkuhler
Vice President – Drilling, LLOG Exploration L.L.C.

<image001.png>

1001 Ochsner Blvd., Suite 200
Covington, Louisiana 70433
Office - (985) 801-4398
Cell - (b) (6)

Event Title and Organizer: 2018 Deepwater Technical Symposium, Sponsored by Society of Petroleum Engineers (SPE) , American Association of Drilling Engineers (AADE) , and New Orleans Geological Society (NOGS) <http://www.deepwaternola.org/>

Date of Event: Tuesday August 28th – Lunch Keynote Speaker (Time TBD)

Location: **New Orleans Downtown Marriott at the Convention Center**, 859 Convention Center Blvd., New Orleans, LA 70130 Phone: (504) 613-2888

Topic: Symposium desires Director Angelle to cover any issue or area of the offshore OCS business, (Safety, permitting, anticipated regulatory changes, upcoming programs/initiatives etc.) that the audience should be aware of.

Length and Format of Remarks: **30-40 Minute Talk followed by 10-15 mins of Q&A from the audience.** If Director Angel prefers to not do the open Q&A that is OK.

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Point of Contact for Event: **Joe Leimkuhler**, Vice President – Drilling, LLOG Exploration
JML@LLOG.com 985-801-4398

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Topic:

Length and Format of Remarks:

Open or Closed Press:

Nature of Press and Expected Coverage (e.g. trade press, local reporters, national media, etc.):

Audience: (expected count and representatives of ?)

Point of Contact for Event:

We look forward to successful participation. We will be talking more as the events get closer. Please do not hesitate to contact me if you have any questions or need additional information.

Sincerely,

Eileen

Eileen P. Angelico, APR
Chief, Office of Public Affairs
Bureau of Safety and Environmental Enforcement
(202) 208-7746 office
(504) 654-7840 mobile

Conversation Contents

[EXTERNAL] Comments on BSEE Proposed Well Control Rule

Attachments:

/25. [EXTERNAL] Comments on BSEE Proposed Well Control Rule/1.1 image001.jpg
/25. [EXTERNAL] Comments on BSEE Proposed Well Control Rule/1.2 API-IADC-
NOIA-IPAA-OOC-PESA-USOGA-FINAL-Proposed-WCR-Comments-08062018.pdf

Holly Hopkins <hopkinsh@api.org>

From: Holly Hopkins <hopkinsh@api.org>
Sent: Tue Aug 07 2018 09:07:38 GMT-0600 (MDT)
"Joe Balash" <joseph_balash@ios.doi.gov>, "Kate Sinclair MacGregor" (b) (6) @gmail.com>, "scott.angelle@bsee.gov" <scott.angelle@bsee.gov>, "Preston Beard" <preston.beard@bsee.gov>, "Doug Morris (douglas.morris@bsee.gov)" <douglas.morris@bsee.gov>, "Brink, Frederick A." <Frederick.Brink@bsee.gov>, "Lars Herbst (lars.herbst@bsee.gov)" <lars.herbst@bsee.gov>, Kirk Malstrom <kirk.malstrom@bsee.gov>
To:
Subject: [EXTERNAL] Comments on BSEE Proposed Well Control Rule
Attachments: image001.jpg API-IADC-NOIA-IPAA-OOC-PESA-USOGA-FINAL-Proposed-WCR-Comments-08062018.pdf

Please find attached the industry comments posted to regulations.gov yesterday on the Proposed WCR.

Thanks,

Holly A. Hopkins
Sr. Policy Advisor, Upstream
American Petroleum Institute
1220 L Street, NW
Washington, DC 20005
202-682-8439 Tel
hopkinsh@api.org

cid:image001

This transmission contains information that is privileged and confidential and is intended solely for use of the individual(s) listed above. If you received the communication in error, please notify me immediately. Any dissemination or copying of this communication by anyone other than the individual(s) listed above is prohibited.



AMERICAN PETROLEUM INSTITUTE



OFFSHORE OPERATORS COMMITTEE



US Oil & Gas
Association



August 6, 2018

Department of the Interior
Bureau of Safety and Environmental Enforcement
Attention: Regulations and Standards Branch
45600 Woodland Road
Sterling, VA 20166

Re: *Blowout Preventer Systems and Well Control Revisions, 1014-AA39*

Via electronic submission to: <http://www.regulations.gov/>

To whom it may concern:

The American Petroleum Institute (API), the International Association of Drilling Contractors (IADC), the Independent Petroleum Association of America (IPAA), the National Ocean Industries Association (NOIA), the Offshore Operators Committee (OOC), the Petroleum Equipment & Services Association (PESA), and the US Oil and Gas Association respectfully submit the following comments on the proposed regulatory revisions to Blowout Preventer Systems and Well Control requirements in 30 C.F.R. part 250. The Bureau of Safety and Environmental Enforcement (BSEE) published these proposed changes on May 11, 2018, in a notice of proposed rulemaking entitled, “Oil and Gas and Sulphur Operations in the Outer Continental Shelf—Blowout Preventer Systems and Well Control Revisions.”

Safety is a core value for the oil and natural gas industry. We are committed to safe operations and support effective regulations in the area of blowout preventer systems and well control. We appreciate the actions of this Administration to eliminate unnecessary burden and to restore

certainty and predictability to the offshore permitting and regulatory regimes. In particular, we welcome the Administration's commitment to review the final Well Control Rule because some of its provisions actually made operating offshore less safe and therefore, a review of this final rule is warranted. These trade associations represent oil and natural gas producers who conduct the vast majority of the Outer Continental Shelf (OCS) oil and natural gas exploration and production activities in the United States as well as the companies supporting the drilling, equipment manufacturing, construction, and support services for the offshore oil and natural gas industry. Our collective commitment to safe operations motivates us to ensure that the regulations in place foster safe operations today and into the future.

While we are pleased to see the Administration and the Department of the Interior (DOI) continuing to make strides to put in place a lasting, domestically-focused energy policy that will help the U.S. "maintain the Nation's position as a global energy leader," the proposed rulemaking leaves additional opportunity on the table. For too long the U.S. has been hampered by the lack of a strong domestic oil and natural gas energy policy. The oil and natural gas industry is committed to developing and producing domestic energy resources for the benefit of all Americans and doing so in a safe and environmentally sound manner. The below context and the attached detailed response demonstrates areas for continued improvement to the safety and economic competitiveness of the OCS oil and natural gas industry.

Secretarial Order 3350, America-First Offshore Energy Strategy, which implements Executive Order 13795, is an important step forward that will help the offshore oil and natural gas industry regain the cost-effective regulatory framework that promotes the certainty and predictability necessary to make the massive capital investments required to bring the benefits from offshore energy projects to the U.S. economy. This will serve to further the Department's stated goal "to ensure that responsible OCS exploration and development is promoted and not unnecessarily delayed or inhibited."

Our comments are submitted without prejudice to any of our member companies' right to have or express different or opposing views. We have encouraged all of our members to submit comments on the proposal.

This letter highlights below some aspects of the proposed rule that would not advance safety and yet would have the greatest negative impact on the industry. In addition, BSEE has solicited, and we have provided, input on specific aspects of the proposed revisions; we also offer additional detailed revisions to the original rule in Attachment A.

Drilling Margins

The 2016 Well Control Rule set a prescriptive drilling margin requirement of 0.5 ppg. Since that time, BSEE has recognized that it has approved operators' use of drilling margins that are less than the 0.5 ppg margin in instances where the prescriptive margin was not fit for purpose. In this proposal, BSEE specifically requests comment on whether this requirement should be eliminated or revised to alternative standards such as a performance-based, well type, or water depth model.

The current 0.5 ppg margin is arbitrary and does not ensure safety. The industry believes that replacing the current requirement with a performance-based standard under which an approved

safe drilling margin would be established on a case-by-case basis, based on data and analysis specific to a particular well, is a safe and better alternative. Such an alternative would provide a risk-based approach that ensures safety and provides investment certainty to the industry. Attachment A provides alternative language for drilling margin requirements and attendant supporting rationale for BSEE's consideration.

BSEE also requests comment on whether there are situations where, despite not being able to maintain the approved safe drilling margin, an operator's continued drilling with an alternative margin creates little risk. In instances where an operator encounters a lost circulation zone, that operator would need to remedy the situation to move forward. Particularly when the lost circulation zone is on bottom, drilling ahead to get through the lost circulation zone may be the safest option to restore the integrity of the well rather than suspending drilling operations altogether to remedy the situation. It is appropriate for operators to specify how they will remedy an anticipated loss of circulation on bottom in the well's DWOP or APD. If an operator experiences an unanticipated loss of circulation or a reduced drilling margin, the operator should provide notice and the operator's plan for remedying the issue to BSEE within a reasonable timeframe.

API Standard 53

The incorporation of API Standard 53 4th edition should also include Addendum 1 to Blowout Prevention Equipment Systems for Drilling Wells, Fourth Edition (July 2016). Industry is finalizing the 5th edition and once it is published, consideration for incorporation by reference should be taken to ensure the U.S. OCS is operating to the latest API standard for well control systems, allowing for continued safety improvements into the future, and is consistent with the remainder of operations around the world.

BOP Equipment & Testing

Industry requests that BSEE align the proposed changes to the Well Control Rule with the 21-day testing interval outlined in API Standard 53 4th Edition (July 2016). This 21-day period has proven to provide assurance of a safe and reliable system without causing premature wear on the equipment. The existing 14-day regulation requirement results in an additional 53% of testing over a 12-month period with a corresponding increase in wear of seals and packers. Industry believes that the testing frequency of API Standard 53 4th Edition (July 2016) is the optimum requirement for worldwide operations. The 21-day testing period of API Standard 53 (July 2016) aligns with the global practice and capabilities of the existing technology installed and utilized in the GOM. If BSEE does not accept industry's proposal regarding a 21-day BOP testing interval, then we recommend BSEE engage in a pilot 21-day testing program to gather the data needed for assessing the difference in BOPE performance between 14 and 21-day testing intervals.

Industry and BSEE recognize that there are technologies that exist, or are in development, that can provide the operator, owner, and OEM with data regarding the equipment's performance. The combination of existing technologies, API Standard 53 failure reporting, and the potential use of emerging technologies may lead to product and process advances that further improve safety and reliability. As these technologies become more widely proven, Industry will continue to review the test frequency requirement within future revisions of API Standard 53.

Real Time Monitoring (RTM)

Industry recommends that RTM be applied to operations using subsea BOPs and surface BOPs from a floating rig defined by API Standard 53, which is already incorporated by reference into the regulations. This would clarify the intent of the RTM system and provide a clear and complete framework for RTM requirements.

With respect to specific operations under RTM (workover, completions, etc.), the covered operations will be defined by each individual Operator's RTM plan, which takes into account the risk of the operation, the individual Operator's Safety and Environmental Management System framework, and alignment through the permitting activity for the specific operation. These types of operations are generally lower risk due to lower complexity, known bottom hole conditions, and in the case of decommissioning, non-flowing wells.

Containment

Industry supports the proposed changes to 30 CFR 250.462, which would clarify the source control equipment requirements based on the operator's Regional Containment Demonstration (RCD) or Well Containment Plan (WCP). Similar to spill equipment (e.g. skimmers, sorbent boom, etc.), the majority of source control equipment has no other commercial purpose and is used solely for emergency containment operations, such as capping stacks, top hats and subsea dispersant wands. This unique containment equipment is maintained by specialty companies, is readily available for inspection at any time, and is maintained and stored for immediate use if an event occurs. Other equipment listed for source control that has broad commercial purpose, such as Remotely Operated Vehicles and vessels are readily available and frequently inspected and maintained for safe and efficient normal operations.

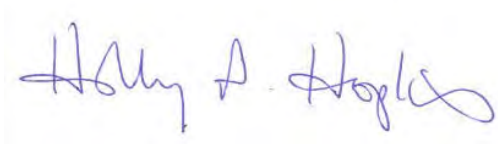
Economic Analysis

API contracted Calash and Blade Energy Partners to perform an independent economic impact analysis of the proposed revisions "Oil and Gas and Sulphur Operations in the Outer Continental Shelf—Blowout Preventer Systems and Well Control Revisions." The report supports BSEE's assertion that the proposed rule increases the competitiveness of America's offshore energy industry. Consistent with the Executive and Secretarial Orders, undue burden has been removed. The report further demonstrates that, without further revision as proposed in Attachment A, an increase in inappropriately restrictive enforcement of the rules still poses a significant financial threat to the industry without a measurable safety benefit. Specifically, the prescriptive drilling margin could be used to limit ~~restrict~~ future offshore development.

We look forward to continued engagement with BSEE on these important regulatory requirements to assure that the energy that is fundamental to our society and its economic prosperity can be developed and delivered safely. It is important that safety regulations indeed enhance safety, rather than hinder it.

Thank you for your consideration of these comments, please do not hesitate to contact us if you have any questions.

Sincerely,



Holly Hopkins, API



Jason McFarland, IADC



Daniel Naatz, IPAA



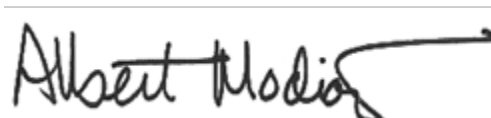
Randall Luthi, NOIA



Evan Zimmerman, OOC



Leslie Beyer, PESA



Alby Modiano, US Oil and Gas Association

Attachment

Proposed Regulation Reference	Proposed New Regulation Text	Comments	Recommended Industry Text
§250.198(h)(63)	(63) API Standard 53, Blowout Prevention Equipment and Systems for Drilling Wells, Fourth Edition, November,2012, incorporated by reference at §§ 250.730m 250.735, 250.737 and 240.739.	<p>In order to remain current with the standards developed and adopted by industry, industry recommends that the regulations incorporate API Standard 53 4th Edition with its Addendum 1, issued in July 2016.</p> <p>Industry is finalizing the 5th edition of API 53, once it is published, consideration for incorporation by reference should be taken to ensure the U.S. OCS is operating to the latest API standard for well control systems and is consistent with the remainder of operations around the world.</p>	<p>Revise 250.198(h)(63) to read: API Standard 53, Blowout Prevention Equipment and Systems for Drilling Wells, Fourth Edition, November,2012, with Addendum 1, July 2016, incorporated by reference at §§ 250.730m 250.735, 250.737 and 240.739.</p>
§250.198(h)(78)	(78) API Standard 65—Part 2, Isolating Potential Flow Zones During Well Construction; Second Edition, December 2010; incorporated by reference at §§ 250.415(f) and 250.420(a)(6);	Industry supports the proposed change which will clarify that the centralization requirements will be governed by API Standard 65-2, reducing the possibility of inconsistent	None. The proposed change is supported.

Proposed Regulation Reference	Proposed New Regulation Text	Comments	Recommended Industry Text
		application across BSEE.	
§250.198 (h)(94)	(94) API Recommended Practice 17H, Remotely Operated Tool and Interfaces on Subsea Production Systems, Second Edition, June 2013, Errata January 2014, incorporated by reference at § 250.734(a)(4);	Industry supports the incorporation by reference of the updated edition of this standard for the reasons given in the preamble of the proposed rule.	None. The proposed change is supported.
§250.413(g)	(g) A single plot containing curves for estimated pore pressures, formation fracture gradients, proposed drilling fluid weights (surface and downhole), planned safe drilling margin, and casing setting depths in true vertical measurements;	In accordance with long standing practices between BSEE and Industry, Industry has reviewed and concurs with providing additional details as requested by BSEE. This continues to follow industry practice of providing additional data at the request of BSEE.	None. The proposed change is supported.
§250.414(c)	(c) Planned safe drilling margin that is between the estimated pore pressure and the lesser of estimated fracture gradients or casing shoe pressure integrity test and that is based on a risk assessment consistent with expected well conditions and operations. (1) Your safe drilling margin must also include use of equivalent downhole mud weight that is: (i) greater than the estimated pore pressure, and (ii) except as provided in paragraph (c) (2) of this section, a minimum of 0.5 pound per gallon below the lower of the casing	The 0.5 ppg value is arbitrary and does not ensure safety. Maintaining the equivalent downhole mud weight above pore pressure manages the potential for influx while managing equivalent circulating density below fracture	(c) Your drilling prognosis is part of your Conceptual Deepwater Operations Plan or APD and must include a planned safe drilling margin that is between the estimated pore pressure and the lesser of estimated fracture gradient or the casing shoe pressure integrity

Proposed Regulation Reference	Proposed New Regulation Text	Comments	Recommended Industry Text
	<p>shoe pressure integrity test or the lowest estimated fracture gradient.</p> <p>(2) In lieu of meeting the criteria in paragraph (c)(1)(ii) of this section, you may use an equivalent downhole mud weight as specified in your APD, provided that you submit adequate documentation (such as risk modeling data, off-set well data, analog data, seismic data) to justify the alternative equivalent downhole mud weight.</p> <p>(3) When determining the pore pressure and lowest estimated fracture gradient for a specific interval, you must consider related off-set and analogous well behavior observations, if available.</p>	<p>gradient (or casing shoe pressure integrity test) manages lost circulation. The regulation should focus on establishing downhole mud weight within this operational window. Further, retaining the arbitrary 0.5 ppg margin hinders promotion of enhanced technology (for example, low ECD drilling fluids, Managed Pressure Drilling), and engineering in well design. By prohibiting this evolution, the regulation could preclude future wells from being drilled safer. The implementation of these technologies will be necessary to enable development of future offshore resources.</p> <p>Industry would like to propose an engineered, performance-based approach standard and suggest replacing current</p>	<p>test and based on a risk assessment consistent with expected well conditions and operations.</p> <p>(1) Your safe drilling margin must provide for:</p> <p>(i) equivalent downhole mud weight that is greater than the estimated pore pressure, and</p> <p>(ii) equivalent circulating density (ECD) that is actively managed below the lesser of the lowest estimated fracture gradient or the casing shoe pressure integrity test. The ECD is supported with hydraulic modeling or other documentation (such as risk modeling data, related analog well data, seismic data).</p> <p>(2) When determining the pore pressure and lowest estimated fracture gradient for a specific interval, you must consider related off-set and analogous well behavior observations, if available.</p>

Proposed Regulation Reference	Proposed New Regulation Text	Comments	Recommended Industry Text
		<p>text to the rule with recommended industry text. In the view of industry, the proposed text was developed to address the concerns and issues that BSEE raised within the preamble text. It is believed that the comments in this letter demonstrate the improved safety and clarity, to industry and the regulator, due to this proposed change.</p> <p>In an effort to build confidence for field development, industry proposes that BSEE apply this proposed text and include CDWOP and APD into the text, in an effort to provide opportunity for early alignment with BSEE for major capital investments going forward.</p> <p>Industry believes that the proposed text changes</p>	

Proposed Regulation Reference	Proposed New Regulation Text	Comments	Recommended Industry Text
		supports current practices and District Manager approval requirement is retained for all cases.	
§250.420(a)(6)	(6) Provide adequate centralization consistent with the guidelines of API Standard 65 –Part 2 (as incorporated by reference in § 250.198); and	Industry supports the proposed change which will clarify that the centralization requirements will be governed by API Standard 65-2, reducing the possibility of inconsistent application across BSEE.	None. The proposed change is supported.

Proposed Regulation Reference	Proposed New Regulation Text	Comments	Recommended Industry Text																		
§§250.421(c), (d), (e) and (f)	<p>What are the casing and cementing requirements by type of casing string? * * * * *</p> <table><tr><th>Casing type</th><th>Casing requirements</th><th>Cementing requirements</th></tr><tr><td colspan="3">* * * * *</td></tr><tr><td>(c) Surface</td><td>Design casing and select setting depths based on relevant engineering and geologic factors. These factors include the presence or absence of hydrocarbons, potential hazards, and water depths</td><td>Use enough cement to fill the calculated annular space to at least 200 feet measured depth (MD) inside the conductor casing. When geologic conditions such as near-surface fractures and faulting exist, you must use enough cement to fill the calculated annular space to the mudline.</td></tr><tr><td>(d) Intermediate</td><td>Design casing and select setting depth based on anticipated or encountered geologic characteristics or wellbore conditions</td><td>Use enough cement to cover and isolate all hydrocarbon-bearing zones and isolate abnormal pressure intervals from normal pressure intervals in the well. As a minimum, you must cement the annular space 500 feet MD above the casing shoe and 500 feet MD above each zone to be isolated.</td></tr><tr><td>(e) Production</td><td>Design casing and select setting depth based on anticipated or encountered geologic characteristics or wellbore conditions</td><td>Use enough cement to cover or isolate all hydrocarbon-bearing zones above the shoe. As a minimum, you must cement the annular space at least 500 feet MD above the casing shoe and 500 feet MD above the uppermost hydrocarbon-bearing zone.</td></tr><tr><td>(f) Liners</td><td>If you use a liner as surface casing, you must set the top of the liner at least 200 feet MD above the previous casing/liner shoe. If you use a liner as an intermediate string below a surface string or production casing below an intermediate string, you must set the top of the liner at least 100 feet MD above the previous casing shoe. You may not use a liner as conductor casing. A subsea well casing string whose top is above the mudline and that has been cemented back to the mudline will not be considered a liner.</td><td>Same as cementing requirements for specific casing types. For example, a liner used as intermediate casing must be cemented according to the cementing requirements for intermediate casing.</td></tr></table>	Casing type	Casing requirements	Cementing requirements	* * * * *			(c) Surface	Design casing and select setting depths based on relevant engineering and geologic factors. These factors include the presence or absence of hydrocarbons, potential hazards, and water depths	Use enough cement to fill the calculated annular space to at least 200 feet measured depth (MD) inside the conductor casing. When geologic conditions such as near-surface fractures and faulting exist, you must use enough cement to fill the calculated annular space to the mudline.	(d) Intermediate	Design casing and select setting depth based on anticipated or encountered geologic characteristics or wellbore conditions	Use enough cement to cover and isolate all hydrocarbon-bearing zones and isolate abnormal pressure intervals from normal pressure intervals in the well. As a minimum, you must cement the annular space 500 feet MD above the casing shoe and 500 feet MD above each zone to be isolated.	(e) Production	Design casing and select setting depth based on anticipated or encountered geologic characteristics or wellbore conditions	Use enough cement to cover or isolate all hydrocarbon-bearing zones above the shoe. As a minimum, you must cement the annular space at least 500 feet MD above the casing shoe and 500 feet MD above the uppermost hydrocarbon-bearing zone.	(f) Liners	If you use a liner as surface casing, you must set the top of the liner at least 200 feet MD above the previous casing/liner shoe. If you use a liner as an intermediate string below a surface string or production casing below an intermediate string, you must set the top of the liner at least 100 feet MD above the previous casing shoe. You may not use a liner as conductor casing. A subsea well casing string whose top is above the mudline and that has been cemented back to the mudline will not be considered a liner.	Same as cementing requirements for specific casing types. For example, a liner used as intermediate casing must be cemented according to the cementing requirements for intermediate casing.	Industry agrees with proposed changes to paragraphs (c), (d), (e), and (f) for the reasons described in the preamble.	None. The proposed change is supported.
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(d) Intermediate	Design casing and select setting depth based on anticipated or encountered geologic characteristics or wellbore conditions	Use enough cement to cover and isolate all hydrocarbon-bearing zones and isolate abnormal pressure intervals from normal pressure intervals in the well. As a minimum, you must cement the annular space 500 feet MD above the casing shoe and 500 feet MD above each zone to be isolated.																			
(e) Production	Design casing and select setting depth based on anticipated or encountered geologic characteristics or wellbore conditions	Use enough cement to cover or isolate all hydrocarbon-bearing zones above the shoe. As a minimum, you must cement the annular space at least 500 feet MD above the casing shoe and 500 feet MD above the uppermost hydrocarbon-bearing zone.																			
(f) Liners	If you use a liner as surface casing, you must set the top of the liner at least 200 feet MD above the previous casing/liner shoe. If you use a liner as an intermediate string below a surface string or production casing below an intermediate string, you must set the top of the liner at least 100 feet MD above the previous casing shoe. You may not use a liner as conductor casing. A subsea well casing string whose top is above the mudline and that has been cemented back to the mudline will not be considered a liner.	Same as cementing requirements for specific casing types. For example, a liner used as intermediate casing must be cemented according to the cementing requirements for intermediate casing.																			
§250.423(a)	(a) You must ensure that the latching mechanisms or lock down mechanisms are engaged upon successfully installing the casing string. If there is an indication of an inadequate cement job, you must comply with §250.428(c).	Industry agrees with proposed change but believe that the second sentence "If there is any	(a) You must ensure that the latching mechanisms or lock down mechanisms are engaged upon successfully																		

Proposed Regulation Reference	Proposed New Regulation Text	Comments	Recommended Industry Text
		<p>indication of an inadequate cement job, you must comply with § 250.428(c)." should be removed. There is no longer a reference to cementing outside of this sentence. The proposed text concerns latching/lock down mechanisms engaging properly. This statement is redundant with the requirements in §250.428, and its removal here would not change the requirement there regarding indications of inadequate cement jobs.</p>	<p>installing the casing string. If there is an indication of an inadequate cement job, you must comply with § 250.428(c).</p>
§250.423(b)	<p>(b) If you run a liner that has a latching mechanism or lock down mechanism, you must ensure that the latching mechanisms or lock down mechanisms are engaged upon successfully installing the liner. If there is an indication of an inadequate cement job, you must comply with §250.428(c).</p>	<p>Industry agrees with proposed change but believe that the second sentence "If there is any indication of an inadequate cement job, you must comply with §250.428(c)." should be removed. There is no longer a reference to cementing outside of this sentence. The proposed text concerns latching/lock</p>	<p>(b) If you run a liner that has a latching mechanism or lock down mechanism, you must ensure that the latching mechanisms or lock down mechanisms are engaged upon successfully installing the liner.</p>

Proposed Regulation Reference	Proposed New Regulation Text	Comments	Recommended Industry Text
		down mechanisms engaging properly. This statement is redundant with the requirements in §250.428, and its removal here would not change the requirement there regarding indications of inadequate cement jobs.	
§250.427(b)	(b) While drilling, you must maintain the safe drilling margins identified in §250.414. When you cannot maintain the safe margins, you must suspend drilling operations and remedy the situation.	In instances where an operator encounters a lost circulation zone, that operator would need to remedy the situation to move forward. Particularly when the lost circulation zone is on bottom, drilling ahead to get through the lost circulation zone may be the safest option to restore the integrity of the well rather than suspending drilling operations altogether to remedy the situation. It is appropriate for	(b) While drilling, you must maintain the safe drilling margins identified in §250.414. When you cannot maintain the safe drilling margins, you must remedy the situation through the implementation of an approved plan (API BULLETIN 92L (92L) or analogous plan (AP)) or suspend drilling operations until the District reviews and approves proposed remedial actions, which may include limited drilling through a lost circulation zone.

Proposed Regulation Reference	Proposed New Regulation Text	Comments	Recommended Industry Text
		operators to specify how they will remedy an anticipated loss of circulation on bottom in the well's DWOP or APD. If an operator experiences an unanticipated loss of circulation or a reduced drilling margin, the operator should provide notice and the operator's plan for remedying the issue to BSEE within a reasonable timeframe.	
§250.428(c)	<p>If you encounter the following situation: (c) Have indication of inadequate cement job (such as unplanned lost returns, no cement returns to mudline or expected height, cement channeling, or failure of equipment),</p> <p>Then you must:</p> <ul style="list-style-type: none"> (1) Locate the top of cement by: <ul style="list-style-type: none"> (i) Running a temperature survey; (ii) Running a cement evaluation log; (iii) Using tracers in the cement and logging them prior to drill out; or (iv) Using a combination of these techniques. (2) Determine if your cement job is inadequate. If your cement job is determined to be inadequate, refer to 	Concerns to c (1) (iii). The use of tracers would be helpful. The concern is around the requirement to log prior to drill out. Some operators are creating extensive shoe tracks to avoid wet shoes and requiring logging be complete prior to drill out might create some inefficiencies that do not change the risk profile.	<p>If you encounter the following situation: (c) Have indication of inadequate cement job (such as unplanned lost returns, no cement returns to mudline or expected height, cement channeling, or failure of equipment),</p> <p>Then you must:</p> <ul style="list-style-type: none"> (1) Locate the top of cement by: <ul style="list-style-type: none"> (i) Running a temperature

Proposed Regulation Reference	Proposed New Regulation Text	Comments	Recommended Industry Text
	<p>paragraph (d) of this section.</p> <p>(3) If your cement job is determined to be adequate, report the results to the District Manager in your submitted WAR.</p>	<p>Tracers are meant to be used when the losses are more likely, and TOC should be able to be found through the BHA MWD GR response.</p>	<p>survey;</p> <p>(ii) Running a cement evaluation log;</p> <p>(iii) Using tracers in the cement and logging them prior to drill out; or</p> <p>(iv) Using a combination of these techniques.</p> <p>(2) Determine if your cement job is inadequate. If your cement job is determined to be inadequate, refer to paragraph (d) of this section.</p> <p>(3) If your cement job is determined to be adequate, report the results to the District Manager in your submitted WAR.</p>
§250.428(d)	<p>Comply with § 250.428(c)(1) and take remedial actions. The District Manager must review and approve all remedial actions either through a previously approved contingency plan within the permit or remedial actions included in a revised permit before you may take them, unless immediate actions must be taken to ensure the safety of the crew or to prevent a well-control event. If you complete any immediate action to ensure the safety of the crew or to prevent a well-control event, submit a description of the action to the District Manager when that action is complete. Any changes to the well program, that are not included in the approved permit, will require submittal of a certification by a</p>	<p>Industry agrees with the proposed changes. In part D, changes will allow for preapproval of contingency plans such as liner top squeezes, shoe squeezes, etc. in addition to the normal method of approval via RPD. This should help minimize rigging having idle time associated with RPD</p>	<p>Recommend adding “if necessary” in §250.428(d). I.e.: Comply with §250.428(c)(1), and take remedial actions, if necessary. The District Manager must review and approve all remedial actions either through a previously approved contingency plan within the permit or remedial</p>

Proposed Regulation Reference	Proposed New Regulation Text	Comments	Recommended Industry Text
	<p>professional engineer (PE) certifying that they have reviewed and approved the proposed changes. You must also meet any other requirements of the District Manager for remedial actions.</p>	<p>process.</p>	<p>actions included in a revised permit before you may take them, unless immediate actions must be taken to ensure the safety of the crew or to prevent a well-control event. If you complete any immediate action to ensure the safety of the crew or to prevent a well-control event, submit a description of the action to the District Manager when that action is complete. Any changes to the well program, that are not included in the approved permit, will require submittal of a certification by a professional engineer (PE) certifying that they have reviewed and approved the proposed changes. You must also meet any other requirements of the District Manager for remedial actions.</p>
§250.433(b)	<p>(b) For floating drilling operations with a subsea BOP stack, you must actuate the diverter system within 7 days after the previous actuation. For subsequent testing, you may partially actuate the</p>	<p>Industry agrees with the proposed change.</p>	<p>None. The proposed change is supported.</p>

Proposed Regulation Reference	Proposed New Regulation Text	Comments	Recommended Industry Text
	diverter element and a flow test is not required.		
§250.461(b)	(b) Survey requirements for directional well. You must conduct directional surveys on each directional well and digitally record the results. Surveys must give both inclination and azimuth at intervals not to exceed 500 feet during the normal course of drilling. Intervals during angle changing portions of the hole may not exceed 180 feet.	Industry agrees with the proposed change.	None. The proposed change is supported.
§250.462	What are the source control, containment, and collocated equipment requirements?	The proposed changes to 30 CFR 250.462 clarify the source control equipment requirements based on the operator's Regional Containment Demonstration (RCD) or Well Containment Plan (WCP). Similar to spill equipment (e.g. skimmers, sorbent boom, etc.), the majority of source control equipment has no other commercial purpose and is used solely for emergent containment operations, such as capping stacks, top hats and subsea dispersant wands. This unique containment equipment is maintained by specialty companies and readily	None. The proposed change is supported.

Proposed Regulation Reference	Proposed New Regulation Text	Comments	Recommended Industry Text
		<p>available for inspection at any time and maintained and stored for immediate use if an event occurs. Other equipment listed for source control that has broad commercial purpose, such as Remotely Operated Vehicles and vessels are readily available and frequently inspected and maintained for safe and efficient normal operations.</p> <p>Proposed revisions to paragraph (e)(3) would clarify that subsea utility equipment utilized solely for containment operations must be available for inspection at all times. Paragraph (e)(4) would also be revised to clarify that it is applicable only to collocated equipment identified in the Regional Containment Demonstration (RCD) or Well Containment</p>	

Proposed Regulation Reference	Proposed New Regulation Text	Comments	Recommended Industry Text
		Plan and not all collocated equipment. The proposed revisions to both paragraphs (e)(3) and (e)(4) would help ensure that the applicable respective equipment is available for inspection. BSEE recognizes that some of the equipment used for containment is used for other types of operations on the OCS and would be available for inspection when in use during other well operations.	
§250.518(e)(1)	(1) All permanently installed packers and bridge plugs qualified as mechanical barriers must comply with ANSI/API Spec. 11D1 (as incorporated by reference in §250.198).	Industry agrees with the proposed change as it would minimize the number of alternate equipment requests submitted to BSEE.	None. The proposed change is supported.
§250.519	Once you install your wellhead, you must meet the casing pressure management requirements of API RP 90 (as incorporated by reference in § 250.198) and the requirements of §§ 250.519 through 250.531. If there is a conflict between API RP 90 and the casing pressure requirements of this subpart, you must follow the requirements of this subpart.	Industry agrees with the proposed administrative change to update incorrect citations.	None. The proposed change is supported.

Proposed Regulation Reference	Proposed New Regulation Text	Comments	Recommended Industry Text												
§250.522	A newly completed or recompleted well often has thermal casing pressure during initial startup. Bleeding casing pressure during the startup process is considered a normal and necessary operation to manage thermal casing pressure; therefore, you do not need to evaluate these operations as a casing diagnostic test. After 30 days of continuous production, the initial production startup operation is complete, and you must perform casing diagnostic testing as required in §§ 250.521 and 250.523.	Industry agrees with the proposed administrative change to update incorrect citations.	None. The proposed change is supported.												
§250.525(d)	(d) Any well that has sustained casing pressure (SCP) and is bled down to prevent it from exceeding its MAWOP, except during initial startup operations described in §250.522;	Industry agrees with the proposed administrative change to update incorrect citations.	None. The proposed change is supported.												
§250.526	<table border="1"> <thead> <tr> <th>You must submit either . . .</th><th>to the appropriate . . .</th><th>and it must include . . .</th><th>You must also . . .</th></tr> </thead> <tbody> <tr> <td>(a) a notification of corrective action; or,</td><td>District Manager and copy the Regional Supervisor, Field Operations,</td><td>requirements under § 250.527,</td><td>submit an Application for Permit to Modify or Corrective Action Plan within 30 days of the diagnostic test.</td></tr> <tr> <td>(b) a casing pressure request,</td><td>Regional Supervisor, Field Operations,</td><td>requirements under § 250.528.</td><td></td></tr> </tbody> </table>	You must submit either . . .	to the appropriate . . .	and it must include . . .	You must also . . .	(a) a notification of corrective action; or,	District Manager and copy the Regional Supervisor, Field Operations,	requirements under § 250.527,	submit an Application for Permit to Modify or Corrective Action Plan within 30 days of the diagnostic test.	(b) a casing pressure request,	Regional Supervisor, Field Operations,	requirements under § 250.528.		Industry agrees with the proposed administrative change to update incorrect citations.	None. The proposed change is supported.
You must submit either . . .	to the appropriate . . .	and it must include . . .	You must also . . .												
(a) a notification of corrective action; or,	District Manager and copy the Regional Supervisor, Field Operations,	requirements under § 250.527,	submit an Application for Permit to Modify or Corrective Action Plan within 30 days of the diagnostic test.												
(b) a casing pressure request,	Regional Supervisor, Field Operations,	requirements under § 250.528.													
§250.530(b)	(b) You must submit the casing diagnostic test data to the appropriate Regional Supervisor, Field Operations, within 14 days of completion of the diagnostic test required under §250.523(e).	Industry agrees with the proposed administrative change to update incorrect citations.	None. The proposed change is supported.												
§250.601(m)	(m) Acid treatments	Industry agrees the proposed change is helpful in minimizing confusion about the definition of routine operations.	None. The proposed change is supported.												
§250.616	[Reserved]	Industry agrees with the	None. The proposed change												

Proposed Regulation Reference	Proposed New Regulation Text	Comments	Recommended Industry Text
		proposed change.	is supported.
§250.619(e)(1)	(1) All permanently installed packers and bridge plugs qualified as mechanical barriers must comply with ANSI/API Spec. 11D1 (as incorporated by reference in §250.198). You must have two independent barriers, one being mechanical, in the exposed center wellbore prior to removing the tree and/or well control equipment;	Industry agrees the proposed change provides clarity as to when packers and bridge plugs need to be qualified as mechanical barriers.	None. The proposed change is supported.
§§250.720(a)(1) and (a)(3)	<p>(a) * * *</p> <p>(1) The events that would cause you to interrupt operations and notify the District Manager include, but are not limited to, the following:</p> <ul style="list-style-type: none"> (i) Evacuation of the rig crew; (ii) Inability to keep the rig on location; (iii) Repair to major rig or well-control equipment; (iv) Observed flow outside the well's casing (e.g., shallow water flow or bubbling); or (v) Impending National Weather Service-named tropical storm or hurricane. <p>* * * * *</p> <p>(3) If you unlatch the BOP or LMRP:</p> <ul style="list-style-type: none"> (i) Upon relatch of the BOP, you must test according to §250.734(b)(2), or (ii) Upon relatch of the LMRP, you must test according to §250.734(b)(3); and (iii) You must receive District Manager approval before resuming operations. 	<p>Industry agrees with the proposed change to codify existing BSEE policy and guidance.</p> <p>While we agree with the revision, we have concerns with the requirement in §250.734(b), incorporated here, to re-test the deadman systems when they have not been repaired or affected by the suspension. It is important to verify that the system is functional, but in cases where the system has not been modified, the previous test should be sufficient. Full discussion of the potential safety risk and proposed alternate</p>	None. The proposed change is supported.

Proposed Regulation Reference	Proposed New Regulation Text	Comments	Recommended Industry Text
		text is included below in §250.734(b).	
§250.720(d)	(d) For subsea completed wells with a tree installed, you must have the equipment and capabilities for intervention on those wells. All equipment utilized solely for intervention operations (e.g., tree interface tools) must be readily available, maintained in accordance with OEM recommendations, and available for inspection by BSEE upon request.	<p>Industry agrees with the inclusion of requirements for the location of required tools for well intervention operations.</p> <p>However, the industry believes the proposed text is overly prescriptive and does not consider the relative risk of active production wells and operators procedures and pressure management guidelines. Industry recommends that BSEE consider applying the following risk-based context to the subsea wells.</p> <p>1. Is the reservoir pressure depleted to a pressure below the seawater hydrostatic pressure at the subsea wellhead? If the answer is yes, then</p>	(d) For subsea completed wells with a tree installed, you must risk assess based on reservoir pressure, MAWHP, production annulus pressure management, and availability of BOP stack with standard intervention kit, and if dictated by the risk assessment , ensure that equipment for intervention operations (e.g., tree interface tools) is identified , available, and properly maintained. The risk assessment must be available for review by BSEE upon request.

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		<p>sufficient mitigations are in place.</p> <p>2. Is the well's current Maximum Anticipated Wellhead Pressure (MAWHP) reduced to a pressure below 50% of the initial well MAWHP, and does the operator have the ability to monitor the pressure in the production annulus (A annulus)? If the answer is yes, then sufficient mitigations are in place.</p> <p>3. Does the well have the ability and the operator's annulus pressure management plan allow the production annulus (A annulus) to be bled to the production system? If the answer is yes, then sufficient mitigations are in place.</p> <p>4. Can the operator utilize a BOP stack with an industry</p>	

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		<p>standard intervention kit (e.g. the Q4000 with IRS), or existing equipment referenced in their well containment plans? If the answer is yes, then sufficient mitigations are in place.</p> <p>If an operator cannot demonstrate at least one of the risk criteria outlined above on an individual well or field basis, then an operator should develop an Intervention Readiness Plan (IRP). The IRP should address response actions required to respond to a potential release for the specific wells or fields identified.</p> <p>Industry can use the proposed criteria to determine whether sufficient mitigations are in place for individual wells / fields or a Readiness Plan is required. This approach</p>	

Proposed Regulation Reference	Proposed New Regulation Text	Comments	Recommended Industry Text
		builds on and codifies effective pressure and well management programs existent in industry and ensures operators are ready to intervene, when the risk of an intervention is appropriate.	
§250.722(a)(2)	(2) Report the results of your evaluation to the District Manager and obtain approval of those results before resuming operations. Your report must include calculations that indicate the well's integrity is above the minimum safety factors, if an imaging tool or caliper is used. District Manager approval is not required to resume operations if you conducted a successful pressure test as approved in your permit. You must document the successful pressure test in the WAR.	Industry agrees with the change allowing for continued operations when a successful pressure test (as per the permit) is obtained.	None. The proposed change is supported.
§250.724(a)	(a) No later than April 29, 2019, when conducting well operations with a subsea BOP or with a surface BOP on a floating facility, or when operating in an high pressure high temperature (HPHT) environment, you must gather and monitor real-time well data using an independent, automatic, and continuous monitoring system capable of recording, storing, and transmitting data regarding the following: (1) The BOP control system; (2) The well's fluid handling system on the rig; and (3) The well's downhole conditions with the bottom hole assembly tools (if any tools are installed).	Industry has concerns with the scope of the rule which would result from the adoption of the proposed text. The proposed text would remove an existing boundary in the regulation limiting the scope of §250.724 to Applications for Permits to Drill (APDs). Industry recommends the addition of language defining RTM applications	(a) No later than April 29, 2019, when conducting well operations with a subsea BOP or with a surface BOP on a floating facility, as defined by API Standard 53 incorporated by reference in §250.198(h)(63) , or when operating in an high pressure high temperature (HPHT) environment, you must gather and monitor real-time well data using an

Proposed Regulation Reference	Proposed New Regulation Text	Comments	Recommended Industry Text
		<p>to those operations covered by API Standard 53 to clearly state, consistent with the current regulations and with the incorporation of Standard 53, 4th Edition, with its Addendum 1, which systems must be covered by an Operator's RTM plan. This would provide clarity on scope in the proposed rule consistent with current regulation.</p> <p>Industry also believes that the existing language in §250.724(a)(2), "well's fluid handling system on the rig" is potentially unclear as some fluid "handling systems" are not part of the active well barrier. For clarity, industry proposes changing the language to read as "well's active circulating system". The industry recommended text relies on standard industry definitions to demonstrate</p>	<p>independent, automatic, and continuous monitoring system capable of recording, storing, and transmitting data regarding the following:</p> <ul style="list-style-type: none"> (1) The BOP control system; (2) The well's active fluid circulating system; and (3) The well's downhole conditions with the bottom hole assembly tools (if any tools are installed).

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		<p>the intent of the current regulations. Additionally, by focusing on the active system, the text of the rule would be aligned with standard industry vernacular for the primary fluid system that is relied on for well control. The most relevant volumes to trend in real time are the active, collectively the “active system”. The current version “well’s fluid handling system” could be inadvertently be interpreted as including other systems on the rig such as sand traps, reserve pits, storage pits, and offline volume. In this case, monitoring those systems could make it difficult to differentiate well behavior by diluting the well response over a larger volume and trending data that is not directly connected to the well. Each operator’s RTM plan should address managing</p>	

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		the monitored pits as the active system on the rig changes. This is commonly managed in industry by the use of the pit volume totalizer (PVT) and flow measurement systems.	
§250.724(b)	<p>Remove existing §250.724(b) and redesignate existing paragraph (c) with minor revisions as paragraph (b).</p> <p>(b) You must develop and implement a real-time monitoring plan. Your real-time monitoring plan, and all real-time monitoring data, must be made available to BSEE upon request. Your real-time monitoring plan must include the following:</p> <ul style="list-style-type: none"> (1) A description of your real-time monitoring capabilities, including the types of the data collected; (2) A description of how your real-time monitoring data will be transmitted during operations, how the data will be labeled and monitored by qualified personnel, and how the data will be stored as required in §§250.740 and 250.741; (3) A description of your procedures for providing BSEE access, upon request, to your realtime monitoring data; (4) The qualifications of the personnel monitoring the data; (5) Your procedures for, and methods of, communication between rig personnel and the monitoring personnel; and (6) Actions to be taken if you lose any real-time monitoring capabilities or communications between rig personnel and monitoring personnel, and a protocol for how you will respond to any significant and/or prolonged interruption of monitoring capabilities or communications, including your protocol for notifying BSEE of any significant and/or prolonged interruptions. 	<p>Industry supports the removal from the rule of the current §250.724(b), allowing a greater degree for operators to develop RTM plans consistent with their specific operational risk, their governing principles, and SEMS procedures.</p> <p>Additionally, industry supports the removal of references to “onshore” from the existing rule.</p> <p>These changes retain the risk ownership of the operation and decision-making with the individual Operator.</p>	None. The proposed change is supported.

Proposed Regulation Reference	Proposed New Regulation Text	Comments	Recommended Industry Text
§250.730(a)	<p>(a) You must ensure that the BOP system and system components are designed, installed, maintained, inspected, tested, and used properly to ensure well control. The working-pressure rating of each BOP component (excluding annular(s)) must exceed MASP as defined for the operation. For a subsea BOP, the MASP must be taken at the mudline. The BOP system includes the BOP stack, control system, and any other associated system(s) and equipment. The BOP system and individual components must be able to perform their expected functions and be compatible with each other. Your BOP system must be capable of closing and sealing the wellbore in the event of flow due to a kick, including under anticipated flowing conditions for the specific well conditions, without losing ram closure time and sealing integrity due to the corrosiveness, volume, and abrasiveness of any fluids in the wellbore that the BOP system may encounter. Your BOP system must meet the following requirements:</p> <p>(1) The BOP requirements of API Standard 53 (incorporated by reference in § 250.198) and the requirements of §§ 250.733 through 250.739. If there is a conflict between API Standard 53 and the requirements of this subpart, you must follow the requirements of this subpart.</p> <p>(2) The provisions of the following industry standards (all incorporated by reference in § 250.198) that apply to BOP systems:</p> <ul style="list-style-type: none"> (i) ANSI/API Spec. 6A; (ii) ANSI/API Spec. 16A; (iii) ANSI/API Spec. 16C; (iv) API Spec. 16D; and (v) ANSI/API Spec. 17D. <p>(3) For surface and subsea BOPs, the pipe and variable bore rams</p>	Industry agrees with the proposed change as it aligns the document with existing industry practices proven successful in Drilling activities worldwide.	None. The proposed change is supported.

Proposed Regulation Reference	Proposed New Regulation Text	Comments	Recommended Industry Text
	<p>installed in the BOP stack must be capable of effectively closing and sealing on the tubular body of any drill pipe, workstring, and tubing (excluding tubing with exterior control lines and flat packs) in the hole under MASP, as defined for the operation, with the proposed regulator settings of the BOP control system.</p> <p>(4) The current set of approved schematic drawings must be available on the rig and at an onshore location. If you make any modifications to the BOP or control system that will change your BSEE-approved schematic drawings, you must suspend operations until you obtain approval from the District Manager.</p>		
§250.730(b)	<p>(b) You must ensure that the design, fabrication, maintenance, and repair of your BOP system is in accordance with the requirements contained in this part, applicable Original Equipment Manufacturers (OEM) recommendations unless otherwise directed by BSEE, and recognized engineering practices. The training and qualification of repair and maintenance personnel must meet or exceed applicable OEM training recommendations unless otherwise directed by BSEE.</p>	<p>Planned and corrective maintenance is written by the Equipment Owner based on the OEM recommendation. The design, fabrication and remanufacture is the remit of the OEM or current equipment manufacturer. The proposed change is to ensure consistency with API 53. Maintenance is covered in §250.730(a).</p>	<p>(b) You must ensure that the design, fabrication, maintenance and repair remanufacture of your BOP system is in accordance with the requirements contained in this part, applicable Original Equipment Manufacturers (OEM) recommendations unless otherwise directed by BSEE, and recognized engineering practices. The training and qualification of repair and remanufacturing personnel must meet or exceed applicable OEM training recommendations unless otherwise directed by BSEE.</p>
§250.730(c)	<p>(c) You must follow the failure reporting procedures contained in</p>	<p>Industry appreciates the</p>	<p>(c) You must follow the</p>

Proposed Regulation Reference	Proposed New Regulation Text	Comments	Recommended Industry Text
	<p>API Standard 53, (incorporated by reference in § 250.198), and:</p> <p>(1) You must provide a written notice of equipment failure to BSEE, unless BSEE has designated a third party as provided in paragraph (d) of this section, and the manufacturer of such equipment within 30 days after the discovery and identification of the failure. A failure is any condition that prevents the equipment from meeting the functional specification.</p> <p>(2) You must ensure that an investigation and a failure analysis are started within 120 days of the failure to determine the cause of the failure and are completed within 120 days upon starting the investigation and failure analysis. You must also ensure that the results and any corrective action are documented. You must ensure that the analysis report is submitted to BSEE, unless BSEE has designated a third party as provided in paragraph (c)(4) of this section, as well as the manufacturer.</p> <p>(3) If the equipment manufacturer notifies you that it has changed the design of the equipment that failed or if you have changed operating or repair procedures as a result of a failure, then you must, within 30 days of such changes, report the design change or modified procedures in writing to BSEE, unless BSEE has designated a third party as provided in paragraph (c)(4) of this section.</p> <p>(4) BSEE may designate a third party to receive the data and reports on behalf of BSEE. If BSEE designates a third party, you must submit the data and reports to the designated third party.</p>	<p>additional time provided by the proposed changes (120 days from incident to 120 days from start of the investigation). Industry recognizes that not all failures will require a detailed investigation. However, industry is concerned that extenuating circumstances (operational or investigation related) may prevent the completion of the investigation within 120 days.</p> <p>Industry proposes that the rule provide a method for extending investigations that have been started but are not complete within the 120 days. The Operator would submit a status update to BSEE detailing the proress to date, reason(s) as to why the investigation is not completed, and a defined extension period.</p>	<p>failure reporting procedures contained in API Standard 53, (incorporated by reference in § 250.198), and:</p> <p>(1) You must provide a written notice of equipment failure to BSEE, unless BSEE has designated a third party as provided in paragraph (d) of this section, and the manufacturer of such equipment within 30 days after the discovery and identification of the failure. A failure is any condition that prevents the equipment from meeting the functional specification.</p> <p>(2) You must ensure that an investigation and a failure analysis are started within 120 days of the failure to determine the cause of the failure and are completed within 120 days upon starting the investigation and failure analysis. If the investigation cannot be completed within the 120-day period, you must submit a status update of the</p>

Proposed Regulation Reference	Proposed New Regulation Text	Comments	Recommended Industry Text
			<p>investigation. You must also ensure that the results and any corrective action are documented. You must ensure that the analysis report and any investigation status updates are submitted to BSEE, unless BSEE has designated a third party as provided in paragraph (c)(4) of this section, as well as the manufacturer.</p> <p>(3) If the equipment manufacturer notifies you that it has changed the design of the equipment that failed or if you have changed operating or repair procedures as a result of a failure, then you must, within 30 days of such changes, report the design change or modified procedures in writing to BSEE, unless BSEE has designated a third party as provided in paragraph (c)(4) of this section.</p> <p>(4) BSEE may designate a third party to receive the data and reports on behalf of</p>

Proposed Regulation Reference	Proposed New Regulation Text	Comments	Recommended Industry Text
			BSEE. If BSEE designates a third party, you must submit the data and reports to the designated third party.
§250.730(d)	<p>(d) If you plan to use a BOP stack manufactured after the effective date of this regulation, you must use one manufactured pursuant to an ANSI/API Spec. Q1 (as incorporated by reference in § 250.198) quality management system. Such quality management system must be certified by an entity that meets the requirements of ISO/IEC 17021-1 (as incorporated by reference in §250.198).</p> <p>(1) BSEE may consider accepting equipment manufactured under quality assurance programs other than ANSI/API Spec. Q1, provided you submit a request to the Chief, Office of Offshore Regulatory Programs for approval, containing relevant information about the alternative program.</p> <p>(2) You must submit this request to the Chief, Office of Offshore Regulatory Programs; Bureau of Safety and Environmental Enforcement; 45600 Woodland Road, Sterling, Virginia 20166.</p>	Industry requests the addition of “or stack sub-assemblies” to provide clarity that the rule is covering the overall BOP Stack and the component assemblies contained within.	<p>(d) If you plan to use a BOP stack and/or Stack sub-assemblies (covered under the specifications incorporated by reference in 250.198) manufactured after the effective date of this regulation, you must use one manufactured pursuant to an ANSI/API Spec. Q1 (as incorporated by reference in § 250.198) quality management system. Such quality management system must be certified by an entity that meets the requirements of ISO/IEC 17021-1 (as incorporated by reference in §250.198).</p> <p>(1) BSEE may consider accepting equipment manufactured under quality assurance programs other than ANSI/API Spec. Q1, provided you submit a request to the Chief, Office of Offshore Regulatory</p>

Proposed Regulation Reference	Proposed New Regulation Text	Comments	Recommended Industry Text
			<p>Programs for approval, containing relevant information about the alternative program.</p> <p>(2) You must submit this request to the Chief, Office of Offshore Regulatory Programs; Bureau of Safety and Environmental Enforcement; 45600 Woodland Road, Sterling, Virginia 20166.</p>
§250.731(a)(5)	(5) Control system pressure and regulator settings needed to close each ram BOP under MASP as defined for the operation;	Industry agrees with proposed change based on field testing.	None. The proposed change is supported.
§250.731(c)	<p>Verification that:</p> <p>(1) Test data demonstrate the shear ram(s) will shear the drill pipe at the water depth as required in § 250.732;</p> <p>(2) The BOP was designed, tested, and maintained to perform under the maximum environmental and operational conditions anticipated to occur at the well;</p> <p>(3) The accumulator system has sufficient fluid to operate the BOP system without assistance from the charging system; and</p> <p>(4) If using a subsea BOP, a BOP in an HPHT environment as defined in § 250.804(b), or a surface BOP on a floating facility, the BOP has not been compromised or damaged from previous service.</p>	Industry agrees with proposed change based on on-going verification, witnessing by independent third parties, and validation procedures which are in place. These practices have proved to be successful in Drilling activities worldwide.	None. The proposed change is supported.
§250.731(f)	MIA	Agree with proposed change based on on-going verification, I3P witnessing,	None. The proposed change is supported.

Proposed Regulation Reference	Proposed New Regulation Text		Comments	Recommended Industry Text		
			and validation procedures in place. These practices have proved to be successful in Drilling activities worldwide.			
§250.732(a)(1)	(a) Prior to beginning any operation requiring the use of any BOP, you must submit verification by an independent third party and supporting documentation as required by this paragraph to the appropriate District Manager and Regional Supervisor.		Industry agrees with proposed change based on on-going verification, witnessing by independent third parties, and validation procedures which are in place. These practices have proved to be successful in Drilling activities worldwide.	None. The proposed change is supported.		
	You must submit verification and documentation related to:	That:				
	(1) Shear testing,	(i) Demonstrates that the BOP will shear the drill pipe and any electric-, wire-, and slick-line to be used in the well;				
		(ii) Demonstrates the use of test protocols and analysis that represent recognized engineering practices for ensuring the repeatability and reproducibility of the tests, and that the testing was performed by a facility that meets generally accepted quality assurance standards;				
		(iii) Provides a reasonable representation of field applications, taking into consideration the physical and mechanical properties of the drill pipe;				
		(iv) Demonstrates the shearing capacity of the BOP equipment to the physical and mechanical properties of the drill pipe; and				
		(v) Includes relevant testing results.				
§250.732(a)(2)	You must submit verification and documentation related to:	That:	Industry proposes that “immediately” be removed	You must submit verification	That:	
	(2) Pressure integrity	(i) Shows that testing is conducted				

Proposed Regulation Reference	Proposed New Regulation Text		Comments	Recommended Industry Text	
	testing, and	immediately after the shearing tests;	<p>from the rule and that “after the shearing is completed and prior to opening the rams” be added as this will provide clarity to the requirement.</p> <p>Industry supports using a 5-minute test as minimum requirement is in line with existing test data and has proved to be successful in Drilling activities worldwide.</p>	and documentation related to:	
		(ii) Demonstrates that the equipment will seal at the rated working pressures (RWP) of the BOP for 5 minutes; and		(2) Pressure integrity testing, and	(i) Shows that testing is conducted after the shearing is completed and prior to opening the rams;
		(iii) Includes all relevant test results.			(ii) Demonstrates that the equipment will seal at the rated working pressures (RWP) of the BOP for 5 minutes; and
					(iii) Includes all relevant test results.
§250.732(a)(3)	You must submit verification and documentation related to:	That:	Industry agrees with the proposed change.	None. The proposed change is supported.	
	(3) Calculations	Include shearing and sealing pressures for all pipe to be used in the well including corrections for MASP.			
§250.732(b)	(b) The independent third-party must be a technical classification society, or a licensed professional engineering firm, or a registered professional engineer capable of providing the		Industry agrees with the proposed change based on existing shear testing	None. The proposed change is supported.	

Proposed Regulation Reference	Proposed New Regulation Text	Comments	Recommended Industry Text										
	required certifications and verifications.	demonstrating that the BOP is capable of shearing the required tubulars.											
§250.732(c) & (d)	<p>(c) For wells in an HPHT environment, as defined by § 250.804(b), you must submit verification by an independent third party that the independent third party conducted a comprehensive review of the BOP system and related equipment you propose to use. You must provide the independent third-party access to any facility associated with the BOP system or related equipment during the review process. You must submit the verifications required by this paragraph (c) to the appropriate District Manager and Regional Supervisor before you begin any operations in an HPHT environment with the proposed equipment.</p> <table><tr><th>You must submit:</th><th>Including:</th></tr><tr><td>(1) Verification that the independent third party conducted a detailed review of the design package to ensure that all critical components and systems meet recognized engineering practices.</td><td></td></tr><tr><td>(2) Verification that the designs of individual components and the overall system have been proven in a testing process that demonstrates the performance and reliability of the equipment in a manner that is repeatable and reproducible.</td><td>(i) Identification of all reasonable potential modes of failure; and (ii) Evaluation of the design verification tests. The design verification tests must assess the equipment for the identified potential modes of failure.</td></tr><tr><td>(3) Verification that the BOP equipment will perform as designed in the temperature, pressure, and environment that will be encountered, and</td><td></td></tr><tr><td>(4) Verification that the fabrication, manufacture, and assembly of individual components and the overall system uses recognized engineering practices and quality control and assurance mechanisms.</td><td>For the quality control and assurance mechanisms, complete material and quality controls over all contractors, subcontractors, distributors, and suppliers at every stage in the fabrication, manufacture, and assembly process.</td></tr></table> <p>(d) You must make all documentation that supports the requirements of this section available to BSEE upon request.</p>	You must submit:	Including:	(1) Verification that the independent third party conducted a detailed review of the design package to ensure that all critical components and systems meet recognized engineering practices.		(2) Verification that the designs of individual components and the overall system have been proven in a testing process that demonstrates the performance and reliability of the equipment in a manner that is repeatable and reproducible.	(i) Identification of all reasonable potential modes of failure; and (ii) Evaluation of the design verification tests. The design verification tests must assess the equipment for the identified potential modes of failure.	(3) Verification that the BOP equipment will perform as designed in the temperature, pressure, and environment that will be encountered, and		(4) Verification that the fabrication, manufacture, and assembly of individual components and the overall system uses recognized engineering practices and quality control and assurance mechanisms.	For the quality control and assurance mechanisms, complete material and quality controls over all contractors, subcontractors, distributors, and suppliers at every stage in the fabrication, manufacture, and assembly process.	Industry agrees with proposed change based on on-going verification, witnessing by independent third parties, and validation procedures which are in place. These practices have proved to be successful in Drilling activities worldwide.	None. The proposed change is supported.
You must submit:	Including:												
(1) Verification that the independent third party conducted a detailed review of the design package to ensure that all critical components and systems meet recognized engineering practices.													
(2) Verification that the designs of individual components and the overall system have been proven in a testing process that demonstrates the performance and reliability of the equipment in a manner that is repeatable and reproducible.	(i) Identification of all reasonable potential modes of failure; and (ii) Evaluation of the design verification tests. The design verification tests must assess the equipment for the identified potential modes of failure.												
(3) Verification that the BOP equipment will perform as designed in the temperature, pressure, and environment that will be encountered, and													
(4) Verification that the fabrication, manufacture, and assembly of individual components and the overall system uses recognized engineering practices and quality control and assurance mechanisms.	For the quality control and assurance mechanisms, complete material and quality controls over all contractors, subcontractors, distributors, and suppliers at every stage in the fabrication, manufacture, and assembly process.												
§250.733(a)(1)	(1) The blind shear rams must be capable of shearing at any point along the tubular body of any drill pipe (excluding tool joints, bottom-hole tools, and bottom hole assemblies that include	Industry does not agree with BSEE’s assertion that “The alternative cutting	(1) Effective April 29, 2021, the blind shear rams (within the scope of API 16A										

Proposed Regulation Reference	Proposed New Regulation Text	Comments	Recommended Industry Text
	heavy-weight pipe or collars), workstring, tubing and associated exterior control lines, and any electric-, wire-, and slick-line that is in the hole and sealing the wellbore after shearing.	<p>device is no longer necessary because the currently commercially available shear rams have increased design capabilities, which are capable of shearing these types of lines.”</p> <p>While rigs utilizing wire-, electric-, slick-line do have a method for cutting these lines, Industry wishes to clarify that BSEE’s statement is not wholly accurate as the OEMs do not offer, and are not expected to offer, wireline cutting capability for all the BOP sizes and rated working pressures currently utilized in the GOM.</p> <p>OEMs do currently offer wireline shear & seal Blind Shear Rams for a range of BOPs, predominately 18-3/4” bore sizes. However, utilizing an 18-3/4” bore BOP is not possible for all</p>	<p>incorporated by reference in 250.198) must be capable of shearing at any point along the tubular body of any drill pipe (excluding tool joints, bottom-hole tools, and bottom hole assemblies that include heavy-weight pipe or collars), workstring, tubing, and any electric-, wire-, and slick-line that is in the hole and sealing the wellbore after shearing. If your blind shear rams are unable to cut any electric-, wire-, or slick-line under MASP as defined for the operation and seal the wellbore, you must use another device capable of shearing the lines before closing the BOP. This device must be available on the rig floor during operations that require their use.</p>

Proposed Regulation Reference	Proposed New Regulation Text	Comments	Recommended Industry Text
		<p>applications because of limitations and/or restrictions for weight, size, and configuration.</p> <p>Accordingly, it will be necessary for BSEE and Industry work together to discuss the available options and limitations of their use.</p> <p>Industry believes it is appropriate to establish a minimum time period of 5 years from the original release of the WCR for design, testing, manufacture, and installation of the requested Blind Shear Rams for all known bore size and rated working pressure combinations that are available. Until these Rams are available, Industry must be allowed to continue to utilize the Alternative Cutting Device referenced in §250.733(a)(1) and</p>	

Proposed Regulation Reference	Proposed New Regulation Text	Comments	Recommended Industry Text
		<p>inclusive of the response to this item below.</p> <p>There are other available cutting device solutions that will cut wireline/etc. As the Cutting Device is part of a system-based approach for the Drilling Operation, the regulatory requirement for the Blind Shear Ram and the BOP Stack itself to be the sole device capable of cutting the wireline/etc is restrictive of innovation related to the intent of this requirement.</p>	
§250.733(b)(1)	(1) For BOPs installed after April 29, 2021, follow the BOP requirements in § 250.734(a)(1).	Industry believes that this proposed change was intended to apply only to NEW floating production facilities.	(1) For BOPs installed on new floating production facilities installed after April 29, 2021 , follow the BOP requirements in § 250.734(a)(1).
§250.733(e)	(e) Additional requirements for surface BOP systems used in well-completion, workover, and decommissioning operations. The minimum BOP system for well-completion, workover, and decommissioning operations must meet the appropriate standards from the following table:	<p>Industry agrees with the proposed change.</p> <p>Industry recognizes and appreciates the deviation from drilling BOP classes and agrees with this wording, confident it does not adversely affect safety</p>	None. The proposed change is supported.

Proposed Regulation Reference	Proposed New Regulation Text	Comments	Recommended Industry Text												
	<table><tr><th>When . . .</th><th>The minimum BOP stack must include . . .</th></tr><tr><td>(1) The expected pressure is less than 5,000 psi.</td><td>Three BOPs consisting of an annular, one set of pipe rams, and one set of blind-shear rams.</td></tr><tr><td>(2) The expected pressure is 5,000 psi or greater or you use multiple tubing strings.</td><td>Four BOPs consisting of an annular, two sets of pipe rams, and one set of blind-shear rams.</td></tr><tr><td>(3) You handle multiple tubing strings simultaneously.</td><td>Four BOPs consisting of an annular, one set of pipe rams, one set of dual pipe rams, and one set of blind-shear rams.</td></tr><tr><td>(4) You use a tapered drill string.</td><td>At least one set of pipe rams that are capable of sealing around each size of drill string. If the expected pressure is greater than 5,000 psi, then you must have at least two sets of pipe rams that are capable of sealing around the larger size drill string. You may substitute one set of variable bore rams for two sets of pipe rams.</td></tr><tr><td>(5) You use a surface BOP on a floating facility.</td><td>The elements required by § 250.733(b)(1) of this part.</td></tr></table>	When . . .	The minimum BOP stack must include . . .	(1) The expected pressure is less than 5,000 psi.	Three BOPs consisting of an annular, one set of pipe rams, and one set of blind-shear rams.	(2) The expected pressure is 5,000 psi or greater or you use multiple tubing strings.	Four BOPs consisting of an annular, two sets of pipe rams, and one set of blind-shear rams.	(3) You handle multiple tubing strings simultaneously.	Four BOPs consisting of an annular, one set of pipe rams, one set of dual pipe rams, and one set of blind-shear rams.	(4) You use a tapered drill string.	At least one set of pipe rams that are capable of sealing around each size of drill string. If the expected pressure is greater than 5,000 psi, then you must have at least two sets of pipe rams that are capable of sealing around the larger size drill string. You may substitute one set of variable bore rams for two sets of pipe rams.	(5) You use a surface BOP on a floating facility.	The elements required by § 250.733(b)(1) of this part.	considerations.	
When . . .	The minimum BOP stack must include . . .														
(1) The expected pressure is less than 5,000 psi.	Three BOPs consisting of an annular, one set of pipe rams, and one set of blind-shear rams.														
(2) The expected pressure is 5,000 psi or greater or you use multiple tubing strings.	Four BOPs consisting of an annular, two sets of pipe rams, and one set of blind-shear rams.														
(3) You handle multiple tubing strings simultaneously.	Four BOPs consisting of an annular, one set of pipe rams, one set of dual pipe rams, and one set of blind-shear rams.														
(4) You use a tapered drill string.	At least one set of pipe rams that are capable of sealing around each size of drill string. If the expected pressure is greater than 5,000 psi, then you must have at least two sets of pipe rams that are capable of sealing around the larger size drill string. You may substitute one set of variable bore rams for two sets of pipe rams.														
(5) You use a surface BOP on a floating facility.	The elements required by § 250.733(b)(1) of this part.														
§250.734(a)(1)(ii)	(ii) A combination of the shear rams must be capable of shearing at any point along the tubular body of any drill pipe (excluding tool joints, bottom-hole tools, and bottom hole assemblies such as heavy-weight pipe or collars), workstring, tubing and associated exterior control lines, appropriate area for the liner or casing landing string, shear sub on subsea test tree, and any electric-, wire-, slick-line in the hole; under MASP. At least one shear ram must be capable of sealing the wellbore after shearing under MASP conditions as defined for the operation. Any non-sealing shear ram(s) must be installed below a sealing shear ram(s).	Industry agrees with the proposed change which is based on a previously published BSEE interpretation.	None. The proposed change is supported.												
§250.734(a)(3)	The accumulator capacity must: (i) Close each required shear ram, ram locks, one pipe ram, and disconnect the LMRP. (ii) Have the capability to perform ROV functions within the required times outlined in API Standard 53 with ROV or flying leads. (iii) No later than April 29, 2021, have bottles for the autoshear and deadman (which may be shared between those two systems)	Industry agrees with the proposed change based on alignment with API Std 53, 4 th edition, with Addendum 1, and in recognition of its proper application and historical success of Subsea BOP	None. The proposed change is supported.												

Proposed Regulation Reference	Proposed New Regulation Text	Comments	Recommended Industry Text
	<p>to secure the wellbore. These bottles may also be utilized to perform the secondary control system functions (e.g., ROV or acoustic functions).</p> <p>(iv) Perform under MASP conditions as defined for the operation.</p>	Stacks around the world.	
§250.734(a)(4)	<p>The ROV must be capable of closing each shear ram, ram locks, one pipe ram, and disconnecting the LMRP under MASP conditions as defined for the operation. The ROV must be capable of performing these functions in the response times outlined in API Standard 53 (as incorporated by reference in §250.198). The ROV panels on the BOP and LMRP must be compliant with API RP 17H (as incorporated by reference in §250.198).</p>	<p>Industry agrees with removing the open function requirement from the ROV Panel.</p> <p>However, industry is not in agreement with the proposed text requiring that the ROV alone (without flying leads) must be capable of meeting the API S53 timing requirements.</p> <p>The text as written does not provide clarity as to whether the timing requirements can be met by the ROV alone or whether the ROV can meet these requirements by using a flying lead as allowed in .734(a)(3)(ii).</p> <p>Industry recommends that the timing requirements align with API Standard 53</p>	<p>The ROV must be capable of closing each shear ram, ram locks, one pipe ram, and disconnecting the LMRP under MASP conditions as defined for the operation. The ROV must be capable of performing these functions independently, via flying lead or external power source in the response times outlined in API Standard 53 (as incorporated by reference in §250.198). The ROV panels on the BOP and LMRP must be compliant with API RP 17H (as incorporated by reference in §250.198).</p>

Proposed Regulation Reference	Proposed New Regulation Text	Comments	Recommended Industry Text
		<p>and the prior references in the WCR with respect to the ROV capability.</p> <p>Industry is also concerned with BSEE's reference to compliance with API 17H 2nd edition, since API Standard 53 (see section 7.3.20.1.3) already covers this requirement.</p> <p>If the intention of this requirement is to ensure compatibility of all ROVs with all BOP Stack mounted ROV panels, then adherence to API 17H Type A, B, or C stab receptacles can meet this requirement and are dimensionally the same in both API RP 17H 1st and 2nd Edition.</p>	
§250.734(a)(6)(iv)	(iv) Autoshear/deadman functions must close, at a minimum, two shear rams in sequence and be capable of performing their expected shearing and sealing action under MASP conditions as defined for the operation.	Industry agrees with the proposed change based on alignment with API Std 53 4 th edition and proper application / historical success of Subsea BOP	None. The proposed change is supported.

Proposed Regulation Reference	Proposed New Regulation Text	Comments	Recommended Industry Text
		Stacks around the world.	
§250.734(a)(16)	(16) Use a BOP system that has the following mechanisms and capabilities; If your control pods contain a subsea electronic module with batteries, a mechanism for personnel on the rig to monitor the state of charge of the subsea electronic module batteries in the BOP control pods	Industry agree with the proposed change to remove the existing §§250.734(a)(16)(i) & (ii).	None. The proposed change is supported.
§250.734(b)	(b) If you suspend operations to make repairs to any part of the subsea BOP system, you must stop operations at a safe downhole location. Before resuming operations, you must: (1) Submit a revised permit with a verification report from an independent third party documenting the repairs and that the BOP is fit for service; (2) Upon relatch of the BOP, perform an initial subsea BOP test in accordance with § 250.737(d)(4), including deadman in accordance with § 250.737(d)(12)(vi). If repairs take longer than 30 days, once the BOP is on deck, you must test in accordance with the requirements of § 250.737; (3) Upon relatch of the LMRP, you must test according to the following: (i) Pressure test riser connector/gasket in accordance with § 250.737(b) and (c); (ii) Pressure test choke and kill stabs at LMRP/BOP interface in accordance with § 250.737(b) and (c); (iii) Full function test of both pods and both control panels; (iv) Verify acoustic pod communication (if equipped); and (v) Deadman test with pressure test in accordance with §250.737(d)(12)(vi). (4) Receive approval from the District Manager.	Retesting the deadman subsea after a successful surface verification is not necessary every time the BOP or LMRP is latched to the wellhead (ex., weather suspensions, disconnect for tubing head spool installation, etc.). Doing so presents unnecessary risk to people, asset and the environment. Proposed that deadman retesting subsea only be required when repairs are made to or could impact the deadman circuit.	b) If operations are suspended to make repairs to any part of the subsea BOP system, you must stop operations at a safe downhole location. Before resuming operations, you must: (1) Submit a revised permit with a verification report from an independent third party documenting the repairs and that the BOP is fit for service; (2) Upon relatch of the BOP, perform an initial subsea BOP test in accordance with § 250.737(d)(4). Deadman test required on surface prior to redeployment and only required subsea if any repairs were made to the deadman circuit; (3) Upon relatch of the

Proposed Regulation Reference	Proposed New Regulation Text	Comments	Recommended Industry Text
			<p>LMRP, you must test according to the following:</p> <ul style="list-style-type: none"> (i) Pressure test riser connector/gasket in accordance with § 250.737(b) and (c); (ii) Pressure test choke and kill stabs at LMRP/BOP interface in accordance with § 250.737(b) and (c); (iii) Full function test of both pods and both control panels; (iv) Verify acoustic pod communication (if equipped); and (v) Deadman test with pressure test in accordance with §250.737(d)(12)(vi) if any repairs were made to the deadman circuit; and <p>(4) Receive approval from the District Manager.</p>
§250.735(a)	(a) An accumulator system (as specified in API Standard 53 and incorporated by reference in § 250.198). Your accumulator system must have the fluid volume capacity and appropriate pre-charge pressures in accordance with API Standard 53. If you supply the accumulator regulators by rig air and do not have a secondary source of pneumatic supply, you must equip the regulators with manual overrides or other devices to ensure capability of hydraulic operations if rig air is lost;	Industry agrees with the proposed change based on its alignment with API Std 53, 4 th edition and proper application / historical success of Subsea BOP Stacks around the world.	None. The proposed change is supported.

Proposed Regulation Reference	Proposed New Regulation Text	Comments	Recommended Industry Text
§250.736(d)(5)	(5) When running casing, a safety valve in the open position available on the rig floor to fit the casing string being run in the hole. For subsea BOPs, the safety valve must be available on the rig floor if the length of casing being run exceeds the water depth, which would result in the casing being across the BOP stack and the rig floor prior to crossing over to the drill pipe running string;	Industry agrees with the proposed change based on proper application / historical success around the world.	None. The proposed change is supported.
§250.737(a)	BSEE has not proposed revision of this section.	Industry proposes BSEE adopt the 21-day test frequency in conformance with API Std 53, 4 th edition. This test period ensures reliability of the sealing components and is based on industry studies to determine the appropriate test frequency to achieve the highest reliability considering wear and fatigue on systems. The change does not impact the weekly function test requirement, which is the most reliable determinant of system health.	Revise §250.737(a) to read as follows: (a) <i>Pressure test frequency.</i> You must pressure test your BOP system: (1) When installed; (2) Before 21 days have elapsed since your last BOP pressure test, or 30 days since your last blind shear ram BOP pressure test. You must begin to test your BOP system before midnight on the 21st day (or 30th day for your blind shear rams) following the conclusion of the previous test; (3) Before drilling out each string of casing or a liner. You may omit this pressure test requirement if you did not remove the BOP stack to run the casing string or liner, the required BOP test

Proposed Regulation Reference	Proposed New Regulation Text	Comments	Recommended Industry Text				
			pressures for the next section of the hole are not greater than the test pressures for the previous BOP test, and the time elapsed between tests has not exceeded 21 days (or 30 days for blind shear rams). You must indicate in your APD which casing strings and liners meet these criteria; (4) The District Manager may require more frequent testing if conditions or your BOP performance warrant.				
§§250.737(b) & (c)	<p>(b) Pressure test procedures. When you pressure test the BOP system, you must conduct a low-pressure test and a high-pressure test for each BOP component (excluding test rams and non-sealing shear rams). You must begin each test by conducting the low-pressure test then transition to the high-pressure test. Each individual pressure test must hold pressure long enough to demonstrate the tested component(s) holds the required pressure. The table in this paragraph (b) outlines your pressure test requirements.</p> <table><tr><td>You must conduct a . . .</td><td>According to the following procedures . . .</td></tr><tr><td>(1) Low-pressure test</td><td>All low-pressure tests must be between 250 and 350 psi. Any initial pressure above 350 psi must be bled back to a pressure between 250 and 350 psi before starting the test. If the initial pressure</td></tr></table>	You must conduct a . . .	According to the following procedures . . .	(1) Low-pressure test	All low-pressure tests must be between 250 and 350 psi. Any initial pressure above 350 psi must be bled back to a pressure between 250 and 350 psi before starting the test. If the initial pressure	<p>Would like the WCR to be consistent in requirements by a) aligning with testing requirements of API Std 53 and b) allowing the use of alternative pressure testing systems that can determine test validity in less than 5 minutes.</p> <p>Would like clarity with respect to statement in .737(b) where the text states “...test must hold pressure long enough to demonstrate the tested</p>	(b) Pressure test procedures. When you pressure test the BOP system, you must conduct a low-pressure test and a high-pressure test for each BOP component. You must begin each test by conducting the low-pressure test then transition to the high-pressure test. Each individual pressure test must be consistent with paragraph (c). The table in this paragraph (b) outlines your pressure test requirements.
You must conduct a . . .	According to the following procedures . . .						
(1) Low-pressure test	All low-pressure tests must be between 250 and 350 psi. Any initial pressure above 350 psi must be bled back to a pressure between 250 and 350 psi before starting the test. If the initial pressure						

Proposed Regulation Reference	Proposed New Regulation Text		Comments	Recommended Industry Text
		exceeds 500 psi, you must bleed back to zero and reinitiate the test.	component(s) holds the required pressure.”	(c) Duration of pressure test. Each Subsea BOP system test must hold the required pressure for 5 minutes, which must be recorded on a chart not exceeding 4 hours or a digital recorder . However, for surface BOP systems and surface equipment of a subsea BOP system, a 3-minute test duration is acceptable if recorded on a chart not exceeding 4 hours, or on a digital recorder . The recorded test pressures must be within the middle half of the chart range, i.e., cannot be within the lower or upper one-fourth of the chart range. If the equipment does not hold the required pressure during a test, you must correct the problem and retest the affected component(s).
	(2) High-pressure test for blind shear ram-type BOPs, ram-type BOPs, the choke manifold, outside of all choke and kill side outlet valves (and annular gas bleed valves for subsea BOP), inside of all choke and kill side outlet valves below uppermost ram, and other BOP components	(i) The high-pressure test must equal the RWP of the equipment or be 500 psi greater than your calculated MASP, as defined for the operation for the applicable section of hole. Before you may test BOP equipment to the MASP plus 500 psi, the District Manager must have approved those test pressures in your permit. (ii) The blind shear ram (BSR) must be tested to: (A) MASP plus 500 psi for the hole section to which it is exposed; or (B) Full well MASP plus 500 psi on initial latch up and all subsequent BSR pressure tests can be done to the casing/liner test pressure for the applicable hole section. (iii) The choke and kill side outlet valves must be tested to, except as provided in paragraph (d)(13) of this section: (A) MASP plus 500 psi for the hole section to which it is exposed; or (B) Full well MASP plus 500 psi on initial latch up and all subsequent pressure tests can be done to the casing/liner test pressure for the applicable hole section.	Vs Section .737(c) where the text states “Each test must hold the required pressure for 5 minutes,...”	
	(3) High-pressure test for annular-type BOPs, inside of choke or kill valves (and annular gas bleed valves for subsea BOP) above the uppermost ram BOP	The high-pressure test must equal 70 percent of the RWP of the equipment or be 500 psi greater than your calculated MASP, as defined for the operation for the applicable section of hole. Before you may test BOP equipment to the MASP plus 500 psi, the District Manager must		

Proposed Regulation Reference	Proposed New Regulation Text		Comments	Recommended Industry Text	
		have approved those test pressures in your APD.			
§§250.737(d)(2), (d)(3), (d)(3)(v), (d)(4)(i), (d)(4)(iii), (d)(4)(v)	BOP System Testing Requirements		Industry agrees with proposed changes, with one exception to 250.737(d)(iv).	250.737(d)(iv) You must verify closure of all critical ROV intervention functions as defined in API 53 during predeployment testing. Any additional installed ROV intervention functions must be verified per the equipment owner’s maintenance program but not to exceed once per year.	
	You must...	Additional requirements...			
	(2) * * *	(ii) Contact the District Manager at least 72 hours prior to beginning the initial test to allow BSEE representative(s) to witness testing.			
	(3) * * *	(iii) Contact the District Manager at least 72 hours prior to beginning the stump test to allow BSEE representative(s) to witness testing			
		(v) You must follow paragraphs (b) and (c) of this section. Pressure testing of each ram and annular component is only required once.			
	(4) * * *	(i) You must begin the initial subsea BOP test on the seafloor within 30 days of the stump test.			
	* * * * *				
		(iii) You must pressure test well-control rams and annulars according to paragraphs (b) and (c) of this section.			
	* * * * *				
	(v) You must test and verify closure of at least one set of rams during the initial subsea test through a ROV hot stab. You must confirm closure of the selected ram through the ROV hot stab with a 1,000 psi pressure test for 5 minutes.				
250.737(d)(5)(ii)	You must...	Additional requirements...	Industry agrees with the removal of “and monthly thereafter” from the rule. Industry would like to see additional alignment between the proposed rule and API Std 53 Section		
	(5) Alternate tests between control stations	(i) For two complete BOP control stations you must: (A) Designate a primary and secondary station; (B) Alternate testing between the primary and secondary control stations on a weekly basis; and (C) For a subsea BOP, develop an alternating testing schedule to ensure the primary and		You must...	Additional requirements...
				(5) Alternate tests between control stations	(i) For two complete BOP control stations you must: (A) Designate a primary and

Proposed Regulation Reference	Proposed New Regulation Text		Comments	Recommended Industry Text	
	<div>secondary control stations will function each pod. (ii) Remote panels where all BOP functions are not included (e.g., life boat panels) must be function-tested upon the initial BOP tests.</div>		<p>7.6.5.1.4 which states “If installed, remote panels where all BOP functions are not included (e.g. lifeboat panels, etc.) shall be function tested in accordance with the equipment owner's procedures.”</p> <p>The inclusion of “in accordance with the equipment owner’s procedures” allows the user to conduct the test with the BOP on-deck and does not alter the effectiveness or intent of the proposed BSEE text.</p>		<p>secondary station; (B) Alternate testing between the primary and secondary control stations on a weekly basis; and (C) For a subsea BOP, develop an alternating testing schedule to ensure the primary and secondary control stations will function each pod. (ii) Remote panels where all BOP functions are not included (e.g., life boat panels) must be function-tested in accordance with the equipment owner’s procedures during the stump (pre-deployment) BOP tests.</p>
§§250.737(d)12(iv) , (d)(12)(vi) & (d)(13)	<div><div>You must... (12) * * *</div><div>Additional requirements... (iv) Following the deadman system test on the seafloor you must document the final remaining pressure of the subsea accumulator system.</div></div>		Industry agrees with the proposed changes.	None. The proposed change is supported.	
	* * * * *				
	<div><div></div><div>(vi) You must confirm closure of the BSR(s) with a 1,000 psi pressure test for 5 minutes.</div></div>				

Proposed Regulation Reference	Proposed New Regulation Text		Comments	Recommended Industry Text
	<div>*****</div> <div><div>(13) Pressure test the choke and kill side outlet valves</div><div>According to paragraph (b), except as follows: (i) For 14 day BOP testing, test the wellbore side of the choke and kill side outlet valves above the uppermost pipe ram to the approved annular test pressure. Choke and kill side outlet valves below the uppermost pipe ram must be tested to MASP plus 500 psi for the applicable hole section. (ii) For the 30 day BSR testing, test the wellbore side of the choke and kill side outlet valves between the upper most pipe ram and the upper most ram, to the casing/liner test pressure or annular test pressure, whichever is greater. (iii) For BOPs with only one choke and kill side outlet valve, you are only required to pressure test the choke and kill side outlet valves from the wellbore side.</div></div>			
§250.738(b)	<div><div>If you encounter the following situation:</div><div>b) * * *</div></div> <div><div>Then you must . . .</div><div>(4) You must submit a report from an independent third party to the District Manager certifying that the BOP is fit for service</div></div>		Industry agrees with the proposed changes.	None. The proposed change is supported.
§250.738(f)	<div><div>If you encounter the following situation:</div><div>(f) Plan to install casing rams or casing shear rams in a surface BOP stack;</div></div> <div><div>Then you must . . .</div><div>Before running casing, perform a shell test to the permit approved test pressure of the BOP component above the casing ram/casing shear. If this installation was not included in your approved permit, and changes the BOP configuration approved in the APD or APM, you must notify and receive approval from the District Manager</div></div>		Industry agrees with the intent of this revision but would likely clarity added regarding the timing/location of the test.	<div><div>If you encounter the following situation:</div><div>(f) Plan to install casing rams or casing shear rams in a surface</div></div> <div><div>Then you must . . .</div><div>Before running casing, perform a shell test to the permit approved test pressure of the BOP component</div></div>

Proposed Regulation Reference	Proposed New Regulation Text	Comments	Recommended Industry Text									
			BOP stack;	above the casing ram/casing shear. Initial pressure testing shall be performed before operations commence. If this installation was not included in your approved permit, and changes the BOP configuration approved in the APD or APM, you must notify and receive approval from the District Manager.								
§§250.738(i), (m) & (o)	<table><tr><th>If you encounter the following situation:</th><th>Then you must . . .</th></tr><tr><td>(i) You activate any shear ram and pipe or casing is sheared;</td><td>Retrieve, physically inspect, and conduct a full pressure test of the BOP stack after the situation is fully controlled. You must submit to the District Manager a report from an independent third party certifying that the BOP is fit to return to service.</td></tr><tr><td colspan="2">*****</td></tr><tr><td>(m) Plan to utilize any other circulating or ancillary equipment (e.g., but not limited to, subsea isolation device, subsea accumulator module,</td><td>Contact the District Manager and request approval in your APD or APM. Your request must include a report from an independent third party on the equipment's design and suitability for its intended use as well as any other information required by the District Manager. The District Manager may impose any conditions regarding the equipment's</td></tr></table>	If you encounter the following situation:	Then you must . . .	(i) You activate any shear ram and pipe or casing is sheared;	Retrieve, physically inspect, and conduct a full pressure test of the BOP stack after the situation is fully controlled. You must submit to the District Manager a report from an independent third party certifying that the BOP is fit to return to service.	*****		(m) Plan to utilize any other circulating or ancillary equipment (e.g., but not limited to, subsea isolation device, subsea accumulator module,	Contact the District Manager and request approval in your APD or APM. Your request must include a report from an independent third party on the equipment's design and suitability for its intended use as well as any other information required by the District Manager. The District Manager may impose any conditions regarding the equipment's	Industry agrees with the proposed changes.	None. The proposed change is supported.	
If you encounter the following situation:	Then you must . . .											
(i) You activate any shear ram and pipe or casing is sheared;	Retrieve, physically inspect, and conduct a full pressure test of the BOP stack after the situation is fully controlled. You must submit to the District Manager a report from an independent third party certifying that the BOP is fit to return to service.											

(m) Plan to utilize any other circulating or ancillary equipment (e.g., but not limited to, subsea isolation device, subsea accumulator module,	Contact the District Manager and request approval in your APD or APM. Your request must include a report from an independent third party on the equipment's design and suitability for its intended use as well as any other information required by the District Manager. The District Manager may impose any conditions regarding the equipment's											

Proposed Regulation Reference	Proposed New Regulation Text		Comments	Recommended Industry Text
	or gas handler) that is in addition to the equipment required in this subpart;	capabilities, operation, and testing.		

	(o) You install redundant components for well control in your BOP system that are in addition to the required components of this subpart (e.g., pipe/variable bore rams, shear rams, annular preventers, gas bleed lines, and choke/kill side outlets or lines);	Comply with all testing, maintenance, and inspection requirements in this subpart that are applicable to those well-control components. If any redundant component fails a test, you must submit a report from an independent third party that describes the failure and confirms that there is no impact on the BOP that will make it unfit for well-control purposes. You must submit this report to the District Manager and receive approval before resuming operations. The District Manager may require you to provide additional information as needed to clarify or evaluate your report.		

§250.739(b) introductory text	(b) A major, detailed inspection of the well control system components (including but not limited to riser, BOP, LMRP, and control pods) must be performed every 5 years. This major inspection may be performed in phased intervals. You must track and document all system and component inspection dates. These records must be available on the rig. An independent third party is required to review the inspection results and must compile a detailed report of the inspection results, including descriptions of any problems and how they were corrected. You must make these reports available to BSEE upon request. This major inspection must be performed every 5 years from the following applicable dates, whichever is later:		Industry agrees with the proposed changes.	None. The proposed change is supported.

Proposed Regulation Reference	Proposed New Regulation Text	Comments	Recommended Industry Text	
250.741(b)(2)	BSEE has not proposed revision of this section.	Industry proposes that BSEE include in the revised rule, a revision to 250.741, that real-time monitoring data retention be adjusted from §250.741(b) two years to §250.741(a) 90 days from completion of the operation. The primary value of the RTM data is in diagnostic of ongoing operation and response to incidents. These scenarios occur during or immediately following conclusion of the operation. Requiring operators to retain the real-time monitoring data for 2 years presents a burden on resource and data storage considering the volume of RTM data anticipated without materially increasing the safety of operations or the ability of industry or BSEE to learn from events. Industry remains supportive of retaining the rest of §250.741(b) with a	You must keep records relating to . . .	Until . . .
			(a) Drilling and real-time monitoring data;	90 days after you complete operations.
			(b) Casing and liner pressure tests, diverter tests, BOP tests, and real time monitoring data;	2 years after the completion of operations.
			(c) Completion of a well or of any workover activity that materially alters the completion configuration or affects a hydrocarbon-bearing zone.	You permanently plug and abandon the well or until you assign the lease and forward the records to the assignee.

Proposed Regulation Reference	Proposed New Regulation Text	Comments	Recommended Industry Text															
		2-year requirement. The barrier verification, casing test, and BOP test data retains value for diagnostic purposes beyond the immediate completion of the operation and should continue to be retained as prescribed in the current regulations.																
§ 250.750																		
§ 250.751																		
§250.1703	(b) Permanently plug all wells. Packers and bridge plugs used as qualified mechanical barriers must comply with ANSI/API Spec. 11D1 (as incorporated by reference in § 250.198). You must have two independent barriers, one being mechanical, in the exposed center wellbore prior to removing the tree and/or well control equipment;	Industry agrees with the changes. They provide clarity as to when packers and bridge plugs need to be qualified as mechanical barriers.	None. The proposed change is supported.															
§250.1704(g)(4) & (h)(2)	<table><tr><th>Decommissioning applications and reports</th><th>When to submit</th><th>Instructions</th></tr><tr><td colspan="3">*****</td></tr><tr><td>(g) ***</td><td>(4) Within 30 days after you complete site clearance verification activities,</td><td>Include information required under § 250.1743(a).</td></tr><tr><td>(h) ***</td><td>(2) Within 30 days after completion of decommissioning activity,</td><td>Include information required under §§ 250.1712 and 250.1721.</td></tr><tr><td colspan="3">*****</td></tr></table>	Decommissioning applications and reports	When to submit	Instructions	*****			(g) ***	(4) Within 30 days after you complete site clearance verification activities,	Include information required under § 250.1743(a).	(h) ***	(2) Within 30 days after completion of decommissioning activity,	Include information required under §§ 250.1712 and 250.1721.	*****			Industry agrees with the change.	None. The proposed change is supported.
Decommissioning applications and reports	When to submit	Instructions																

(g) ***	(4) Within 30 days after you complete site clearance verification activities,	Include information required under § 250.1743(a).																
(h) ***	(2) Within 30 days after completion of decommissioning activity,	Include information required under §§ 250.1712 and 250.1721.																

§250.1706	Remove and reserve	Industry agrees with the change.	None. The proposed change is supported.															

Proposed Regulation Reference	Proposed New Regulation Text	Comments	Recommended Industry Text
§250.1716(b)	(3) The water depth is greater than 1,000 feet.	Industry agrees with the change.	None. The proposed change is supported.
§250.1722(d) introductory text	(d) Within 30 days after you complete the trawling test described in paragraph (c) of this section, submit a report to the appropriate District Manager using form BSEE-0125, End of Operations Report (EOR) that includes the following:	Industry agrees with the change.	None. The proposed change is supported.

Questions posed by BSEE related to BOP Equipment and Drilling Margin		
Proposed Regulation Reference	Proposed Question	Recommended Industry Response
§250.198	<p><u>API Standard 53 – Edition to Incorporate:</u> At this time, BSEE does not propose to incorporate the API Standard 53 addendum into this proposed rule. However, BSEE is considering incorporating the API Standard 53 addendum in the final rule. BSEE is specifically soliciting comments on whether the API Standard 53 addendum should be included within the documents incorporated by reference.</p> <p>Please provide reasons for your position. If your comment addresses anticipated monetary or operational benefits associated with using the API Standard 53 addendum, please provide any available supporting data.</p>	<p>Industry’s opinion is that the final rule should incorporate the latest released edition of API Standard 53 at the time of its publishing. In this case this is likely to be API Standard 53 4th Edition with its Addendum 1, issued in July 2016.</p> <p>A large portion of the GOM install base is already in compliance with API Standard 53 4th Edition w/ Addendum & Errata (July 2016). This addendum was compiled, reviewed, and approved by Industry representatives from Operators, Equipment Owners, OEMs, Independent Third Parties, and Service Companies within the API community. The addendum and errata provided clarity to existing text and increases operational safety and reliability.</p> <p>Industry would urge the agency to consider how the 5th Edition of API Standard 53 can be expeditiously incorporated into its regulation once it is published.</p>
§250.730	<p><u>General req’s for BOP systems & components - Failures:</u> Based upon the unknown situations that could arise around the completion of the failure analysis and availability of the equipment, BSEE is specifically soliciting comments about whether specifying a completion date for the failure analysis is appropriate and if so whether 120 days from the commencement of the analysis is appropriate.</p> <p>Please provide reasons for your position and any applicable associated data.</p>	<p>We appreciate the additional time provided by the proposed changes (120 days from incident to 120 days from start of the investigation). We recognize that not all failures will require a detailed investigation. However, we are concerned that extenuating circumstances (operational or investigation related) may prevent the completion of the investigation within 120 days.</p> <p>Industry proposes that BSEE allow a method for extending the completion dated for investigations that have been started but are not complete within the 120 days. In such cases, industry suggests the operator</p>

		submit a status update to BSEE detailing the progress to date and reason(s) as to why the investigation is not completed.
§250.733	<p><u>Requirements for Surface BOP Stack – Alt Cutting Device:</u> This rulemaking would revise paragraph (a)(1) by removing the reference to an extended time for compliance with exterior control line shearing requirements under the original WCR, which BSEE anticipates will have run and no longer warrant reference in the regulations by the time a final rule is promulgated. BSEE also proposes to remove the requirement to have an alternative cutting device used for shearing electric-, wire-, or slick-line if your blind shear rams are unable to cut and seal under maximum anticipated surface pressure (MASP). The alternative cutting device is no longer necessary because the currently commercially available shear rams have increased design capabilities, which are capable of shearing these types of lines. BSEE is aware of concerns regarding the removal of the alternative cutting device option. Therefore, BSEE is considering other options in the final rule, such as keeping the alternative cutting device provisions in the regulations or extending the compliance date to allow the use of the alternative cutting devices until a more appropriate date when the surface stack shear rams can be upgraded to shear electric-, wire-, or slick-line.</p> <p>A. BSEE is specifically soliciting comments about the effectiveness of using an alternative cutting device and whether BSEE should continue to allow its use.</p> <p>B. Additionally, BSEE is also specifically soliciting comments on how long it would take for surface stack shear rams to be upgraded to shear electric-, wire-, or slick-line. Please provide reasons for your</p>	<p>Industry does not concur with BSEE’s conclusion that the provisions for alternative cutting devices can be removed “because the currently commercially available shear rams ... are capable of shearing these types of lines.”</p> <p>While rigs utilizing wire-, electric-, slick-line do have a method for cutting these lines, we wish to clarify that BSEE’s statement is not completely accurate as the OEMs do not offer wireline cutting capability for all BOP sizes and rated working pressures currently utilized in the GOM.</p> <p>OEMs do currently offer wireline shear & seal Blind Shear Rams for a range of BOPs, predominately 18-3/4” bore sizes. However, utilizing an 18-3/4” bore BOP is not possible for all applications because of limitations and/or restrictions for weight, size, and configuration.</p> <p>Therefore, we propose that BSEE and Industry work together to discuss the available options and limitations of their use.</p> <p>Industry requests a minimum time period of 5 years from the original release of the WCR for design, testing, manufacture, and installation of the requested Blind Shear Rams for all known bore size and rated working pressure combinations that are available. Until these Rams are available, Industry will utilize the Alternative Cutting Device referenced in §250.733(a)(1).</p>

	position and any applicable associated data.	There are other cutting device solutions that will cut wireline/etc available. As the Cutting Device is part of a system-based approach for the Drilling Operation, the regulatory requirement for the Blind Shear Ram and the BOP Stack itself to be the sole device capable of cutting the wireline/etc is restrictive of innovation related to the intent of this requirement.
§250.734	<p><u>Requirements for Subsea BOP System - Centering:</u> BSEE believes that operators will continue to substitute new components for old ones to comply with the still-required increased shearing capability provisions of the original WCR. BSEE is aware of many technological advancements in shearing ram designs and capabilities. BSEE expects the shear rams to shear pipe or wire in any position within the wellbore; however, BSEE is specifically soliciting comments about the effectiveness of requiring shear rams to center pipe or wire while shearing or requiring shear rams to have the capability to shear any pipe or wire in the hole without a separate centering mechanism. Another option BSEE is considering is retaining the centering mechanism requirements, but expressly providing that the shear rams with these capabilities satisfy the requirements.</p> <p>Please provide reasons for your position and any applicable associated data.</p>	<p>Industry agrees with the proposed rule change to remove the existing §§250.734(a)(16)(i) and (ii).</p> <p>Industry does not believe that that the WCR should provide prescriptive design requirements for the Shear Ram itself: The performance standards for such equipment are adequately addressed in API 16A 4th Edition, which should, along with its subsequent editions, serve as the basis for the agency's regulations going forward.</p>
Section III	<p><u>Additional Comments Solicited – BOP Testing Frequency</u></p> <p>A. BSEE is requesting comments on whether the BOP testing interval should be 7 days, 14 days, or 21 days for all types of operations including drilling, completions, workovers, and decommissioning.</p> <p>B. BSEE is also requesting comments on the specific cost and operational implications of each testing interval to further its consideration of the issue.</p>	<p>Propose:</p> <p><u>A: Testing Duration (7, 14, or 21 days)</u> Industry requests that BSEE align the proposed changes to the Well Control Rule with the 21-day testing interval outlined in API Standard 53 4th Edition (July 2016). This 21-day period has proven to provide assurance of a safe and reliable system without causing premature wear on the equipment. The existing 14-day regulation</p>

	<p>The industry and BSEE currently rely on function and hydrostatic tests to verify the performance of BOP equipment in the field. These tests have traditionally been the primary method of verifying the capability of in-service equipment.</p> <p>In recent years, the industry has raised concerns related to the benefits of pressure and functional testing of subsea BOPs when compared to the costs and potential operational issues.</p> <p>BSEE requests comments on the adequacy of the current functional and pressure test requirements in predicting the performance of this equipment in subsequent drilling operations.</p> <p>C. Under what circumstances or environments should the testing frequency be increased or decreased?</p> <p>BSEE is aware of potential technologies that may improve the operability and reliability of BOP systems.</p> <p>D. Are there additional technologies, processes, or procedures that can be used to supplement existing requirements and provide additional assurances related to the performance of this equipment?</p> <p>Please provide supporting reasons and data for your responses.</p>	<p>requirement results in an additional 53% of testing over a 12-month period with a corresponding increase in wear of seals and packers.</p> <p><u>B: Cost and Operation Implications</u> Previously submitted Joint Trades sponsored Economic Study remains valid for this issue.</p> <p><u>C: Circumstances or Environments based Frequency</u> Industry believes that the testing frequency of API Standard 53 4th Edition (July 2016) is the optimum requirement for typical worldwide operations.</p> <p><u>D: Technology, Processes, Procedures for Additional Assurance</u> The 21-day testing period of API Standard 53 (July 2016) aligns with the global practice and capabilities of the existing technology installed and utilized in the GOM.</p> <p>Industry and BSEE recognize that there are technologies that exist, or are in development, that can provide the operator, owner, and OEM with data regarding the equipment's performance.</p> <p>The combination of existing technologies, API Standard 53 failure reporting, and the potential use of emerging technologies may lead to product and process improvements aiding reliability and the goal of further improved safety. As these technologies become more widely proven, Industry will continue to review the test frequency requirement within future revisions of API Standard 53.</p>
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§250.414	BSEE request comment on replacing it with a more performance-based standard under which the approved safe drilling margin is established on a case-by-case basis for each well.	<p>Industry welcomes the opportunity to propose an engineered performance-based standard for the establishment of appropriate safe drilling margins thru the well permitting process. Evaluation and analysis of industry data of wells drilled demonstrates that operators have safely planned and drilled sections of wells below the current default 0.5 ppg drilling margin.</p> <p>The industry has a good record of using hydraulic modeling techniques to plan the working drilling margin required to drill a hole section, and while drilling, actively control downhole wellbore pressure between the pore pressure and the expected shoe pressure integrity test or the lowest estimated fracture gradient. The hydraulic models consider factors including cutting loads, fluid temperature and rheology, drill string and wellbore configuration, drill string rotation speed and flowrates. The hydraulic models are calibrated to</p>
§250.414	BSEE also request comment on potentially providing for a different drilling margin or multiple drilling margins that are specific to the conditions in which the wells are drilled, such as if the well is drilling in deep water or shallow water.	
§250.414	BSEE further request comment on whether removal of a specific reference to a 0.5 ppg standard from the regulation may be appropriate.	

§250.414	<p>BSEE also request comment on the criteria that BSEE could use to apply alternative approaches, such as an operator demonstrating that a well is a development well as opposed to an exploratory well.</p>	<p>historic data. The use of real time downhole pressure while drilling (PWD) tools allows the operator to confirm model accuracy. While drilling the hole section, drilling parameters are actively managed to keep the circulating and static mud density within the planned drilling margin. Since 2010, the modeling software and computing resource utilized to build accurate models has improved significantly. The use of this technology has improved safety and will continue to meet or exceed regulatory requirements.</p> <p>Industry proposes that a Supplemental Drilling Margin Information Sheet (attached) be submitted as part of the permitting process. This plan will outline the expected drilling margin for each section based on engineering work using hydraulic models. Industry experience in managing drilling margin risk has demonstrated that the primary safety risk factors are: the presence of hydrocarbons; potential for flow; and the consequence of losses. A stable column of fluid is a primary well control barrier in drilling operations. This engineered approach, consistent with the requirements of the CFR, is applicable in shallow water or deepwater wells and exploration or development wells. There are reasonable situations where margins less than 0.5ppg can be safe when considering the full fluid system and the described risk factors.</p> <p>The operator will manage downhole pressures for each section within the approved drilling margin plan. Drilling can continue while the operator can manage downhole ECDs below the shoe pressure integrity test or the lowest estimated fracture gradient for the section. Equivalent downhole mud weight will be kept above the</p>
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		estimated pore pressure. District Manager approval is required if the approved plan cannot be maintained.
§250.414	BSEE request comment on what supplemental data would provide an adequate level of justification for deviating from the 0.5 ppg drilling margin under identified circumstances. Etc.....	<p>As discussed above, the engineering, performance-based approach does not support the 0.5 ppg drilling margin.</p> <p>As specified in comments submitted by industry in reference to §250.414 (c) and as shown on the accompanying spreadsheet (Supplemental Drilling Margin Information Sheet) a deviation is irrelevant.</p>
§250.414	BSEE also requests comment on whether there are situations where drilling can continue prior to receiving alternative safe drilling margin approval from BSEE.	As discussed above, the engineering, performance-based approach necessitates BSEE approval.

§250.414	<p>BSEE request comment on</p> <ol style="list-style-type: none"> 1) whether there are situations where, despite not being able to maintain the approved safe drilling margin, an operator continued drilling with an alternative drilling margin creates little risk. 2) the criteria that BSEE should use to define those situations and available alternative drilling margins. 3) what level of follow-up reporting (.....) would be appropriate. 	<p>Industry has provided comments and recommended text changes for §250.414(c). Industry members believe that should the BSEE accept the proposed text and accompanying spreadsheet details for the Well Control Rule, then, industry could work with the BSEE in further development of an audit process similar to that required for Cementing using the 65-2 document.</p>
§250.414	<p>BSEE is specifically soliciting comments about the effectiveness of the use of related analogous data and how the pore pressure and fracture gradient are determined without related analogous data. Please provide reasons for your position.</p>	<p>Pore pressure and fracture gradients are not determined on GoM wells without the use of some type of related analogous data such as well data, seismic data and/or other geological data. In addition, there are region specific overburden/pore pressure/fracture gradient models and standard work flows used in conjunction with seismic data for regions without any nearby well control. Operators are responsible for identifying the appropriate analogous data for each well and evaluating their applicability.</p>

Supplemental Drilling Margin Information Sheet

1. OPERATOR NAME Oil Company A					5. WELL NAME <i>(Proposed)</i> 001		6. TYPE OF WELL <input checked="" type="checkbox"/> EXPLORATORY <input type="checkbox"/> DEVELOPMENT		11. WATER DEPTH (ft) 4,028		12. ELEVATION KB (ft) 82			
2. API WELL NO. <i>(Proposed)</i> (12 Digits)					3. BOTTOM LEASE NO. <i>(Proposed)</i>		7. SIDETRACK NO. 00		8. BYPASS NO. <i>(Proposed)</i> 00					
4. TOTAL DEPTH <i>(Proposed)</i> ftMD 28,500 ftTVD 26,000					9. RIG NAME OOC Drill 1				10. RIG TYPE DP Drill Ship					
13. ENGINEERING DATA														
Hole Size (in) (decimals)	Liner, Casing, Jet Pipe	Casing Size (in) (decimals)	Casing Depth (feet KB)	Drilling Fluid Type (Oil Base, Water Base, Synthetic)	\$250.414 (c) (1) (i)		\$250.414 (c) (1) (ii)					\$250.427 (b)	Comments	
					Estimated Pore Pressure (ppg)	Equivalent Downhole Mud Weight (ppg)	ECD (ppg)	Lowest Estimated Fracture Gradient (ppg)	Pressure Integrity Test (ppg)	Hydraulic Modeling				Other Documentation (Such as risk modeling data, related analog well data, seismic data)
										Software Name & Version	Depth modelled (MD kb)			
			MD											
			TVD											
Jetted	Drive Pipe	38	3,970 3,970	Seawater										Riserless ¹
32.5	Conductor	28	6,300 6,300	Seawater										Riserless ¹
26	Surface Casing	22	7,000 7,000	Seawater										Riserless ¹
21	Intermediate Liner	18	8,500 8,500	SBM									API 92L/AP	
19	Intermediate Liner	16	11,729 11,729	SBM									API 92L/AP	
17.5	Protective Casing	14	20,200 19,490	SBM									API 92L/AP	
14.5	Protective Liner	11.75	22,300 21,179	SBM								e.g risk assessment, more recent and relevant analogous data, updated geological environmental data	API 92L/AP	e.g. Developed field and have significant data to support ECD modeling.
8.5	Open Hole	-	28,500 26,000	SBM									API 92L/AP	
Instructions and comments: Complete the table for all hole sections.														

Conversation Contents

[EXTERNAL] Today

Holly Hopkins <hopkinsh@api.org>

From: Holly Hopkins <hopkinsh@api.org>
Sent: Thu Aug 16 2018 05:01:10 GMT-0600 (MDT)
To: Scott Angelle <scott.angelle@bsee.gov>
CC: Preston Beard <preston.beard@bsee.gov>
Subject: [EXTERNAL] Today

Unfortunately, I can not come to DC today. (b) (5)
I can talk by phone at 1 today or we can reschedule for tomorrow or next week. I'm so sorry for the inconvenience.

Scott Angelle <scott.angelle@bsee.gov>

From: Scott Angelle <scott.angelle@bsee.gov>
Sent: Thu Aug 16 2018 05:32:03 GMT-0600 (MDT)
To: Holly Hopkins <hopkinsh@api.org>
CC: Preston Beard <preston.beard@bsee.gov>
Subject: Re: [EXTERNAL] Today

No worries. (b) (6). Another time in person is preferred

Sent from my iPhone

On Aug 16, 2018, at 7:01 AM, Holly Hopkins <hopkinsh@api.org> wrote:

Unfortunately, I can not come to DC today. (b) (6)
I can talk by phone at 1 today or we can reschedule for tomorrow or next week. I'm so sorry for the inconvenience.

Holly Hopkins <hopkinsh@api.org>

From: Holly Hopkins <hopkinsh@api.org>
Sent: Thu Aug 16 2018 06:31:13 GMT-0600 (MDT)
To: Scott Angelle <scott.angelle@bsee.gov>
CC: Preston Beard <preston.beard@bsee.gov>
Subject: Re: [EXTERNAL] Today

Ok. So sorry, I tried but could not do it. Preston, please call my cell to reschedule. Thanks

----- Original message -----

From: Scott Angelle <scott.angelle@bsee.gov>

Date: 8/16/18 7:32 AM (GMT-05:00)

To: Holly Hopkins <hopkinsh@api.org>

Cc: Preston Beard <preston.beard@bsee.gov>

Subject: Re: [EXTERNAL] Today

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Conversation Contents

RE: [EXTERNAL] RE: Subsea bolts and fasteners

Holly Hopkins <hopkinsh@api.org>

From: Holly Hopkins <hopkinsh@api.org>
Sent: Tue Sep 04 2018 07:14:49 GMT-0600 (MDT)
To: Eileen Angelico <eileen.angelico@bsee.gov>
Doug Morris <douglas.morris@bsee.gov>,
CC: "lars.herbst@bsee.gov" <lars.herbst@bsee.gov>, "Preston Beard" <preston.beard@bsee.gov>, Monica Mcbrady <monica.mcbrady@bsee.gov>
Subject: RE: [EXTERNAL] RE: Subsea bolts and fasteners

Hi - do we have a confirmed time and location for this meeting? Industry will have ~30 people in attendance. Thanks -----Original Message----- From: Eileen Angelico <eileen.angelico@bsee.gov> Sent: Thursday, June 21, 2018 12:44 PM To: Holly Hopkins <hopkinsh@api.org> Cc: Doug Morris <douglas.morris@bsee.gov>; lars.herbst@bsee.gov Subject: Re: [EXTERNAL] RE: Subsea bolts and fasteners Thanks Holly, We can confirm for the morning of Sept. 20th. Eileen Sent from my iPhone > On Jun 21, 2018, at 12:39 PM, Holly Hopkins <hopkinsh@api.org> wrote: > > Do we have a confirmed date/time for the meeting? Thanks > > -----Original Message----- > From: Scott Angelle <scott.angelle@bsee.gov> > Sent: Friday, June 15, 2018 2:52 PM > To: Holly Hopkins <hopkinsh@api.org> > Cc: Doug Morris <douglas.morris@bsee.gov>; Eileen Angelico <eileen.angelico@bsee.gov>; lars.herbst@bsee.gov > Subject: Re: [EXTERNAL] RE: Subsea bolts and fasteners > > Thanks!! We will be seeking to finalize meeting schedules and will > get back to you next week. Have a great day > > Sent from my iPhone > > On Jun 15, 2018, at 2:45 PM, Holly Hopkins <hopkinsh@api.org> wrote: > > Scott, > > API and our members would be happy to meet with you and your Houston staff the morning of Thursday, September 20 in Houston. > > > Thanks, > > Holly > > > -----Original Message----- > > From: Scott Angelle <scott.angelle@bsee.gov> > > Sent: Monday, June 11, 2018 11:16 AM > > To: Holly Hopkins <hopkinsh@api.org> > > Cc: Doug Morris <douglas.morris@bsee.gov>; Eileen Angelico <eileen.angelico@bsee.gov>; lars.herbst@bsee.gov > > Subject: Subsea bolts and fasteners > > > Thank you for your email of may 11 on the above referenced and thank you for your assistance with this effort. > > > I will be in Houston during the week of aug 26 to 31 and again sept > > 16 to 21 and I am requesting a briefing with API or appropriate > > industry representatives and our Houston staff on the progress and an > > estimate to get from the 65 percent you cite in the may 11 email to > > 100 percent Thanks and just let me know availability > > > Sent from my iPhone > > >

"Angelico, Eileen" <eileen.angelico@bsee.gov>

From: "Angelico, Eileen" <eileen.angelico@bsee.gov>
Sent: Tue Sep 04 2018 08:34:43 GMT-0600 (MDT)
Doug Morris <douglas.morris@bsee.gov>, "Beard, Preston" <preston.beard@bsee.gov>, Jarvis Outlaw
To:

<jarvis.outlaw@bsee.gov>

CC: "Mcbrady, Monica" <monica.mcbrady@bsee.gov>

Subject: Fwd: [EXTERNAL] RE: Subsea bolts and fasteners

Doug,

It is very likely that the Director will not be available to be in Houston on the 20th. He does believe that the meeting can take place without him, and request that you take the lead with the meeting.

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Please confirm receipt of this email and we can proceed from there. I will respond to Holly that the meeting is still scheduled for the morning of Thursday, Sept. 20th.

Thanks,

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BSEE Public Affairs
(504) 654-7840 mobile

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Date: Tue, Sep 4, 2018 at 8:14 AM

Subject: RE: [EXTERNAL] RE: Subsea bolts and fasteners

To: Eileen Angelico <eileen.angelico@bsee.gov>

Cc: Doug Morris <douglas.morris@bsee.gov>, "lars.herbst@bsee.gov" <lars.herbst@bsee.gov>, Preston Beard <preston.beard@bsee.gov>, Monica Mcbrady <monica.mcbrady@bsee.gov>

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From: "Beard, Preston" <preston.beard@bsee.gov>
Sent: Tue Sep 04 2018 08:37:13 GMT-0600 (MDT)
To: eileen.angelico@bsee.gov
Subject: Read: Fwd: [EXTERNAL] RE: Subsea bolts and fasteners

Your message To: Beard, Preston Subject: Fwd: [EXTERNAL] RE: Subsea bolts and fasteners
Sent: 9/4/18, 10:34:43 AM EDT was read on 9/4/18, 10:37:13 AM EDT

"Outlaw, Jarvis" <jarvis.outlaw@bsee.gov>

From: "Outlaw, Jarvis" <jarvis.outlaw@bsee.gov>
Sent: Tue Sep 04 2018 08:58:27 GMT-0600 (MDT)
To: "Angelico, Eileen" <eileen.angelico@bsee.gov>
CC: Doug Morris <douglas.morris@bsee.gov>, "Beard, Preston" <preston.beard@bsee.gov>, "Mcbrady, Monica" <monica.mcbrady@bsee.gov>
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"Outlaw, Jarvis" <jarvis.outlaw@bsee.gov>

From: "Outlaw, Jarvis" <jarvis.outlaw@bsee.gov>
Sent: Tue Sep 04 2018 09:04:32 GMT-0600 (MDT)
To: "Angelico, Eileen" <eileen.angelico@bsee.gov>
Doug Morris <douglas.morris@bsee.gov>, "Beard, Preston"
CC: <preston.beard@bsee.gov>, "Mcbrady, Monica"
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Subject: Re: [EXTERNAL] RE: Subsea bolts and fasteners

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Jarvis Outlaw

HETC Supervisor
Petroleum Engineer
Houston Engineering and Technology Center
DOI-BSEE
1919 Smith Street
Suite 14042
Houston, TX 77002
(713) 220-9205 (office)
(713) 751 0285 (fax)
(571) 385-7258 (cell)
Jarvis.outlaw@bsee.gov

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CC: <preston.beard@bsee.gov>, "Mcbrady, Monica"
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Sent: Mon Sep 10 2018 09:19:01 GMT-0600 (MDT)
To: "Outlaw, Jarvis" <jarvis.outlaw@bsee.gov>
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CC: <preston.beard@bsee.gov>, "Mcbrady, Monica"
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Subject: Re: [EXTERNAL] RE: Subsea bolts and fasteners

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BSEE Public Affairs
(504) 654-7840 mobile

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"Beard, Preston" <preston.beard@bsee.gov>

From: "Beard, Preston" <preston.beard@bsee.gov>
Sent: Mon Sep 10 2018 09:21:06 GMT-0600 (MDT)
To: eileen.angelico@bsee.gov
Subject: Read: Re: [EXTERNAL] RE: Subsea bolts and fasteners

Your message To: Beard, Preston Subject: Re: [EXTERNAL] RE: Subsea bolts and fasteners
Sent: 9/10/18, 11:19:01 AM EDT was read on 9/10/18, 11:21:06 AM EDT

Jarvis Outlaw <jarvis.outlaw@bsee.gov>

From: Jarvis Outlaw <jarvis.outlaw@bsee.gov>
Sent: Mon Sep 10 2018 17:55:24 GMT-0600 (MDT)
To: "Angelico, Eileen" <eileen.angelico@bsee.gov>
Doug Morris <douglas.morris@bsee.gov>, "Beard, Preston"
CC: <preston.beard@bsee.gov>, "Mcbrady, Monica"
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From: "Outlaw, Jarvis" <jarvis.outlaw@bsee.gov>
Sent: Wed Sep 12 2018 11:59:33 GMT-0600 (MDT)
To: "Angelico, Eileen" <eileen.angelico@bsee.gov>
Doug Morris <douglas.morris@bsee.gov>, "Beard, Preston" <preston.beard@bsee.gov>, "Mcbrady, Monica" <monica.mcbrady@bsee.gov>
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Yes, we definitely need the room for the whole morning.

The Director, Doug, and I met on this meeting yesterday. The Director is now available to attend. We may be splitting the meeting into two sessions with different topics and attendees.

I will get back to you with more information by tomorrow.

Thanks,

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Conversation Contents

Re: [EXTERNAL] PSAP Update

Scott Angelle <scott.angelle@bsee.gov>

From: Scott Angelle <scott.angelle@bsee.gov>
Sent: Fri Sep 28 2018 18:58:49 GMT-0600 (MDT)
To: Joe Leimkuhler <jml@llog.com>
CC: Preston Beard <preston.beard@bsee.gov>
Subject: Re: [EXTERNAL] PSAP Update

Sorry for the delayed response. Through a copy of this message I'm asking Preston to schedule. Thanks

Sent from my iPhone

On Sep 28, 2018, at 9:21 AM, Joe Leimkuhler <jml@llog.com> wrote:

Scott,

DO you have time for a phone call on Monday 5-10 mins to discuss the go forward plan on a PSAP pilot within Safe OCS? I have a meeting scheduled with the SafeOCS folks in DC set for October 17th where I hope to develop a framework of how such a program would work with SAFE OCS versus in addition to SafeOCS. WOULD appreciate your view and input prior to that meeting.

Joe


Joseph Leimkuhler
Vice President – Drilling, LLOG Exploration L.L.C.

<image001.png>
1001 Ochsner Blvd., Suite 100
Covington, Louisiana 70433
(985) 801-4300

Disclaimer: This message (including any attachments) is intended only for the confidential use of the intended recipient(s). If you are not the intended recipient(s) of the message, you are hereby notified that you should delete this message and that any review, dissemination, distribution or copying by you of this message is strictly prohibited.

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Conversation Contents

[EXTERNAL] Automatic reply: Revised SOW for NAS

Holly Hopkins <hopkinsh@api.org>

From: Holly Hopkins <hopkinsh@api.org>
Sent: Wed Oct 10 2018 10:09:51 GMT-0600 (MDT)
To: "Beard, Preston" <preston.beard@bsee.gov>
Subject: [EXTERNAL] Automatic reply: Revised SOW for NAS

I am currently out of the office on business travel until Thursday, October 11, 2018. I will respond to your message as soon as possible. Thanks, have a great day!

Conversation Contents

[EXTERNAL] RE: Bast

Holly Hopkins <hopkinsh@api.org>

From: Holly Hopkins <hopkinsh@api.org>
Sent: Fri Oct 19 2018 12:44:17 GMT-0600 (MDT)
To: Scott Angelle <scott.angelle@bsee.gov>
"Evan@offshoreoperators.com" <Evan@offshoreoperators.com>,
CC: "Beard, Preston" <preston.beard@bsee.gov>, "Monica Mcbrady" <monica.mcbrady@bsee.gov>
Subject: [EXTERNAL] RE: Bast

Scott,

Evan and I would like to schedule time with you on/after November 14/15 to deliver our comments on BAST. Please let us know what works for you.

Thanks,
Holly

From: Scott Angelle <scott.angelle@bsee.gov>
Sent: Thursday, October 4, 2018 6:26 AM
To: Holly Hopkins <hopkinsh@api.org>; Evan@offshoreoperators.com
Cc: marcella.burke@sol.doi.gov
Subject: Bast

Good morning. It was a pleasure to visit with yesterday at the noia conference in San Antonio.

Additionally, thank you for the opportunity to visit with selected members of your organizations to discuss our efforts on the best available and safest technologies (bast) program during my recent visit to Houston.

We look forward to receiving your comments by [November 15, 2018](#). Thanks for your interest in a safer outer continental shelf.

Sent from my iPhone

Scott Angelle <scott.angelle@bsee.gov>

From: Scott Angelle <scott.angelle@bsee.gov>
Sent: Fri Oct 19 2018 14:17:27 GMT-0600 (MDT)
To: Holly Hopkins <hopkinsh@api.org>
"Evan@offshoreoperators.com" <Evan@offshoreoperators.com>,
CC: "Beard, Preston" <preston.beard@bsee.gov>, Monica Mcbrady <monica.mcbrady@bsee.gov>
Subject: Re: [EXTERNAL] RE: Bast

Thanks ! Preston and Monica please accommodate
Sent from my iPhone

On Oct 19, 2018, at 2:44 PM, Holly Hopkins <hopkinsh@api.org> wrote:

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Evan and I would like to schedule time with you on/after November 14/15 to deliver our comments on BAST. Please let us know what works for you.

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Sent from my iPhone

"Beard, Preston" <preston.beard@bsee.gov>

From: "Beard, Preston" <preston.beard@bsee.gov>
Sent: Sun Oct 21 2018 11:36:23 GMT-0600 (MDT)
To: Scott Angelle <scott.angelle@bsee.gov>
CC: Monica Mcbrady <monica.mcbrady@bsee.gov>
Subject: Re: [EXTERNAL] RE: Bast

Sir, we will be in WV policy meeting. Would you like me to ask OOC and API for alternate dates?

On Fri, Oct 19, 2018 at 4:17 PM Scott Angelle <scott.angelle@bsee.gov> wrote:

Thanks ! Preston and Monica please accommodate
Sent from my iPhone

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Sent from my iPhone

--

Preston Beard
Advisor, Office of the Director
Bureau of Safety and Environmental Enforcement
(202) 208-3976 (o)
(571) 585-7001 (c)
preston.beard@bsee.gov



Scott Angelle <scott.angelle@bsee.gov>

From: Scott Angelle <scott.angelle@bsee.gov>
Sent: Sun Oct 21 2018 11:51:11 GMT-0600 (MDT)
To: Holly Hopkins <hopkinsh@api.org>
"Evan@offshoreoperators.com" <Evan@offshoreoperators.com>,
CC: "Beard, Preston" <preston.beard@bsee.gov>, Monica Mcbrady
<monica.mcbrady@bsee.gov>
Subject: Re: [EXTERNAL] RE: Bast

Those dates are a challenge as I will be offsite for meetings. Please suggest alternatives.
Thanks

Sent from my iPhone

On Oct 19, 2018, at 2:44 PM, Holly Hopkins <hopkinsh@api.org> wrote:

Scott,

Evan and I would like to schedule time with you on/after November 14/15 to deliver our comments on BAST. Please let us know what works for you.

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Cc: marcella.burke@sol.doi.gov
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Sent from my iPhone

Scott Angelle <scott.angelle@bsee.gov>

From: Scott Angelle <scott.angelle@bsee.gov>
Sent: Sun Oct 21 2018 11:52:09 GMT-0600 (MDT)
To: "Beard, Preston" <preston.beard@bsee.gov>
CC: Monica Mcbrady <monica.mcbrady@bsee.gov>
Subject: Re: [EXTERNAL] RE: Bast

I will let them know if the challenges

Sent from my iPhone

On Oct 21, 2018, at 1:36 PM, Beard, Preston <preston.beard@bsee.gov> wrote:

Sir, we will be in WV policy meeting. Would you like me to ask OOC and API for alternate dates?

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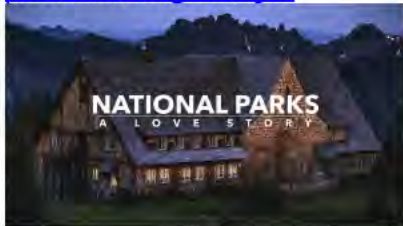
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Thanks for your interest in a safer outer continental shelf.

Sent from my iPhone

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Preston Beard
Advisor, Office of the Director
Bureau of Safety and Environmental Enforcement
(202) 208-3976 (o)
(571) 585-7001 (c)
preston.beard@bsee.gov



Conversation Contents

Scott Angelle <scott.angelle@bsee.gov>

From: Scott Angelle <scott.angelle@bsee.gov>
Sent: Sat Oct 27 2018 08:49:14 GMT-0600 (MDT)
To: Preston Beard <preston.beard@bsee.gov>
CC: Evan@offshoreoperators.com, Holly Hopkins <hopkinsh@api.org>
Subject:

Preston, please contact Evan and holly to advise them of the schedule changes that might allow for the accommodation of their original request to meet in dc in mid November Please let me know the results of your efforts Sent from my iPhone

Preston Beard <preston.beard@bsee.gov>

From: Preston Beard <preston.beard@bsee.gov>
Sent: Sat Oct 27 2018 09:27:06 GMT-0600 (MDT)
To: Scott Angelle <scott.angelle@bsee.gov>
CC: Evan@offshoreoperators.com, Holly Hopkins <hopkinsh@api.org>
Subject: Re:

Director, We have slated 11/27 at 11am for the meeting -Preston 571-585-7001 > On Oct 27, 2018, at 10:49 AM, Scott Angelle <scott.angelle@bsee.gov> wrote: > > Preston, please contact Evan and holly to advise them of the schedule > changes that might allow for the accommodation of their original > request to meet in dc in mid November > > Please let me know the results of your efforts > > Sent from my iPhone

Scott Angelle <scott.angelle@bsee.gov>

From: Scott Angelle <scott.angelle@bsee.gov>
Sent: Sat Oct 27 2018 09:30:17 GMT-0600 (MDT)
To: Preston Beard <preston.beard@bsee.gov>
CC: Evan@offshoreoperators.com, Holly Hopkins <hopkinsh@api.org>
Subject: Re:

I assume that was before we knew of the changed schedule. Have you asked if they wish to take advantage of the new opening? Sent from my iPhone > On Oct 27, 2018, at 11:27 AM, Preston Beard <preston.beard@bsee.gov> wrote: > > Director, > > We have slated 11/27 at 11am for the meeting > > -Preston > 571-585-7001 > >> On Oct 27, 2018, at 10:49 AM, Scott Angelle <scott.angelle@bsee.gov> wrote: >> >> Preston, please contact Evan and holly to

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>> >> Sent from my iPhone

Preston Beard <preston.beard@bsee.gov>

From: Preston Beard <preston.beard@bsee.gov>
Sent: Sat Oct 27 2018 11:13:58 GMT-0600 (MDT)
To: Scott Angelle <scott.angelle@bsee.gov>
CC: Evan@offshoreoperators.com, Holly Hopkins
<hopkinsh@api.org>
Subject: Re:

I have not. Our November 15-16 slot has opened back up if you would prefer that. -Preston 571-585-7001 > On Oct 27, 2018, at 11:30 AM, Scott Angelle <scott.angelle@bsee.gov> wrote: > > I assume that was before we knew of the changed schedule. Have you > asked if they wish to take advantage of the new opening? > > Sent from my iPhone > >> On Oct 27, 2018, at 11:27 AM, Preston Beard <preston.beard@bsee.gov> wrote: >> >> Director, >> >> We have slated 11/27 at 11am for the meeting >> >> -Preston >> 571-585-7001 >> >>> On Oct 27, 2018, at 10:49 AM, Scott Angelle <scott.angelle@bsee.gov> wrote: >>> >>> Preston, please contact Evan and holly to advise them of the schedule >>> changes that might allow for the accommodation of their original >>> request to meet in dc in mid November >>> >>> Please let me know the results of your efforts >>> >>> Sent from my iPhone

Scott Angelle <scott.angelle@bsee.gov>

From: Scott Angelle <scott.angelle@bsee.gov>
Sent: Sat Oct 27 2018 12:02:36 GMT-0600 (MDT)
To: Preston Beard <preston.beard@bsee.gov>
CC: Evan@offshoreoperators.com, Holly Hopkins
<hopkinsh@api.org>
Subject: Re:

Isn't that what my original email request you do? Sent from my iPhone > On Oct 27, 2018, at 1:13 PM, Preston Beard <preston.beard@bsee.gov> wrote: > > I have not. Our November 15-16 slot has opened back up if you would > prefer that. > > -Preston > 571-585-7001 > >> On Oct 27, 2018, at 11:30 AM, Scott Angelle <scott.angelle@bsee.gov> wrote: >> >> I assume that was before we knew of the changed schedule. Have you >> asked if they wish to take advantage of the new opening? >> >> Sent from my iPhone >> >>> On Oct 27, 2018, at 11:27 AM, Preston Beard <preston.beard@bsee.gov> wrote: >>> >>> Director, >>> >>> We have slated 11/27 at 11am for the meeting >>> >>> -Preston >>> 571-585-7001 >>> >>>> On Oct 27, 2018, at 10:49 AM, Scott Angelle <scott.angelle@bsee.gov> wrote: >>>> >>>> Preston, please contact Evan and holly to advise them of the schedule >>>> changes that might allow for the accommodation of their original >>>> request to meet in dc in mid November >>>> >>>> Please let me know the results of your efforts >>>> >>>> Sent from my iPhone

Conversation Contents

Re: [EXTERNAL] RE: Availability of OOC General Meeting Registration

"Angelico, Eileen" <eileen.angelico@bsee.gov>

From: "Angelico, Eileen" <eileen.angelico@bsee.gov>
Sent: Wed Oct 31 2018 08:25:17 GMT-0600 (MDT)
To: Evan Zimmerman <evan@zimmerman-co.com>
evan@offshoreoperators.com, Greg Southworth
<greg@southworthconsulting.com>, Rebecca Wolfgang
<rebecca@offshoreoperators.com>, "Beard, Preston"
<preston.beard@bsee.gov>, "Dessauer, Stephen"
<stephen.dessauer2@bsee.gov>
CC:
Subject: Re: [EXTERNAL] RE: Availability of OOC General Meeting Registration

Thank you Evan for your prompt response.

The Director is interested in having a teleconference possibly Friday, November 2, 2018, to discuss the Accelerated Compliance Together pilot program presentation scheduled for the Dec 5th General Meeting.

We have availability on Friday, Nov. 2, at 12:00 pm CDT and 3:00 pm CDT.

Please let me know.

Thanks,

Eileen

Eileen P. Angelico, APR
Chief, Office of Public Affairs
Bureau of Safety and Environmental Enforcement
(504) 654-7840 mobile

On Wed, Oct 31, 2018 at 8:58 AM <evan@zimmerman-co.com> wrote:

The meeting is open to all industry, no press.

Cheers,

Evan H. Zimmerman
Executive Director
Offshore Operators Committee
evan@offshoreoperators.com

----- Original Message -----

Subject: Availability of OOC General Meeting Registration
From: "Angelico, Eileen" <eileen.angelico@bsee.gov>
Date: Wed, October 31, 2018 8:56 am
To: <evan@offshoreoperators.com>, Greg Southworth
<greg@southworthconsulting.com>

Cc: Rebecca Wolfgang <rebecca@offshoreoperators.com>

Good morning Evan and Greg,

I hope this email finds you both well. I need to clarify if registration for the Dec. 5th General Meeting is open to all industry members or only to OOC member organizations.

I look forward to hearing from you.

Sincerely,

Eileen

Eileen P. Angelico, APR
Chief, Office of Public Affairs
Bureau of Safety and Environmental Enforcement
(504) 654-7840 mobile

<evan@zimmerman-co.com>

From: <evan@zimmerman-co.com>
Sent: Wed Oct 31 2018 08:38:24 GMT-0600 (MDT)
To: "Angelico, Eileen" <eileen.angelico@bsee.gov>
<evan@offshoreoperators.com>, Greg Southworth
<greg@southworthconsulting.com>, Rebecca Wolfgang
<rebecca@offshoreoperators.com>, "Beard, Preston"
CC: <preston.beard@bsee.gov>, "Dessauer, Stephen"
<stephen.dessauer2@bsee.gov>, Angie Barbara
<angie@offshoreoperators.com>
Subject: RE: [EXTERNAL] RE: Availability of OOC General Meeting
Registration

Eileen,

I can be available for a call 12:00 to 1:00 Central time but have a hard stop at 1pm for a University Board meeting.

Cheers,

Evan H. Zimmerman
Executive Director
Offshore Operators Committee
evan@offshoreoperators.com

----- Original Message -----

Subject: Re: [EXTERNAL] RE: Availability of OOC General Meeting
Registration

From: "Angelico, Eileen" <eileen.angelico@bsee.gov>

Date: Wed, October 31, 2018 9:25 am

To: Evan Zimmerman <evan@zimmerman-co.com>

Cc: <evan@offshoreoperators.com>, Greg Southworth
<greg@southworthconsulting.com>, Rebecca Wolfgang
<rebecca@offshoreoperators.com>, "Beard, Preston"
<preston.beard@bsee.gov>, "Dessauer, Stephen"
<stephen.dessauer2@bsee.gov>

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Bureau of Safety and Environmental Enforcement
(504) 654-7840 mobile

Greg Southworth <greg@southworthconsulting.com>

From: Greg Southworth <greg@southworthconsulting.com>

Sent: Wed Oct 31 2018 09:04:46 GMT-0600 (MDT)
To: <evan@zimmerman-co.com>, "Angelico, Eileen"
<eileen.angelico@bsee.gov>
<evan@offshoreoperators.com>, Rebecca Wolfgang
<rebecca@offshoreoperators.com>, "Beard, Preston"
CC: <preston.beard@bsee.gov>, "Dessauer, Stephen"
<stephen.dessauer2@bsee.gov>, Angie Barbara
<angie@offshoreoperators.com>
Subject: RE: [EXTERNAL] RE: Availability of OOC General Meeting
Registration

I am available at the same time as Evan.

Greg Southworth

Associate Director
Offshore Operators Committee

Office: 504-904-7966
Cell: (b) (6)
greg@offshoreoperators.com

2400 Veterans Memorial Blvd, Suite 206
Kenner, Louisiana 70062

www.theooc.org

From: evan@zimmerman-co.com <evan@zimmerman-co.com>
Sent: Wednesday, October 31, 2018 9:38 AM
To: Angelico, Eileen <eileen.angelico@bsee.gov>
Cc: evan@offshoreoperators.com; Greg Southworth <greg@southworthconsulting.com>; Rebecca Wolfgang <rebecca@offshoreoperators.com>; Beard, Preston <preston.beard@bsee.gov>; Dessauer, Stephen <stephen.dessauer2@bsee.gov>; Angie Barbara <angie@offshoreoperators.com>
Subject: RE: [EXTERNAL] RE: Availability of OOC General Meeting Registration

Eileen,

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evan@offshoreoperators.com

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Cc: <evan@offshoreoperators.com>, Greg Southworth
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"Angelico, Eileen" <eileen.angelico@bsee.gov>

From: "Angelico, Eileen" <eileen.angelico@bsee.gov>
Sent: Wed Oct 31 2018 09:27:28 GMT-0600 (MDT)
To: Evan Zimmerman <evan@zimmerman-co.com>
evan@offshoreoperators.com, Greg Southworth
<greg@southworthconsulting.com>, Rebecca Wolfgang
CC: <rebecca@offshoreoperators.com>, "Beard, Preston"
<preston.beard@bsee.gov>, "Dessauer, Stephen"
<stephen.dessauer2@bsee.gov>, angie@offshoreoperators.com
Subject: Re: [EXTERNAL] RE: Availability of OOC General Meeting
Registration

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Eileen

On Wed, Oct 31, 2018 at 9:39 AM <evan@zimmerman-co.com> wrote:

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Executive Director
Offshore Operators Committee
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----- Original Message -----

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(504) 654-7840 mobile

"Beard, Preston" <preston.beard@bsee.gov>

From: "Beard, Preston" <preston.beard@bsee.gov>
Sent: Wed Oct 31 2018 09:31:06 GMT-0600 (MDT)
To: Eileen Angelico <eileen.angelico@bsee.gov>
Subject: Re: [EXTERNAL] RE: Availability of OOC General Meeting Registration

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<greg@southworthconsulting.com>
Cc: Rebecca Wolfgang <rebecca@offshoreoperators.com>

Good morning Evan and Greg,

I hope this email finds you both well. I need to clarify if registration for the Dec. 5th General Meeting is open to all industry members or only to OOC member organizations.

I look forward to hearing from you.

Sincerely,

Eileen

Eileen P. Angelico, APR
Chief, Office of Public Affairs
Bureau of Safety and Environmental Enforcement
(504) 654-7840 mobile

--

Preston Beard
Advisor, Office of the Director
Bureau of Safety and Environmental Enforcement
(202) 208-3976 (o)
(571) 585-7001 (c)
preston.beard@bsee.gov



Conversation Contents

[EXTERNAL] Re:

Holly Hopkins <hopkinsh@api.org>

From: Holly Hopkins <hopkinsh@api.org>
Sent: Sat Oct 27 2018 12:51:32 GMT-0600 (MDT)
To: Scott Angelle <scott.angelle@bsee.gov>, Preston Beard <preston.beard@bsee.gov>
CC: "Evan@offshoreoperators.com" <Evan@offshoreoperators.com>
Subject: [EXTERNAL] Re:

Preston,

Can you please let us know who from BSEE will participate in the meeting on Nov 15. Can we also set up a conference line for the meeting? Or we can use mine if you like. With the new date one of our co-chairs can't come to DC in person on Nov 15.

Thanks,
Holly

From: Beard, Preston <preston.beard@bsee.gov>
Sent: Sunday, October 28, 2018 9:43 AM
To: Holly Hopkins <hopkinsh@api.org>; Evan@offshoreoperators.com; Scott Angelle <scott.angelle@bsee.gov>
Subject: Re: [EXTERNAL] Re:

I have blocked off 2-5 on 11/15

On Sat, Oct 27, 2018 at 3:02 PM Holly Hopkins <hopkinsh@api.org> wrote:

We could do something between 2 and 5 pm on Nov 15. But we are also fine keeping the Nov 27th time. Let us know. Thanks

----- Original message -----

From: Scott Angelle <scott.angelle@bsee.gov>
Date: 10/27/18 2:02 PM (GMT-05:00)
To: Preston Beard <preston.beard@bsee.gov>
Cc: Evan@offshoreoperators.com, Holly Hopkins <hopkinsh@api.org>
Subject: Re:

Isn't that what my original email request you do?

Sent from my iPhone

> On Oct 27, 2018, at 1:13 PM, Preston Beard <preston.beard@bsee.gov> wrote:
>
> I have not. Our November 15-16 slot has opened back up if you would
> prefer that.
>
> -Preston
> 571-585-7001
>

>> On Oct 27, 2018, at 11:30 AM, Scott Angelle <scott.angelle@bsee.gov> wrote:
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>>>> Please let me know the results of your efforts
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>>>> Sent from my iPhone

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(571) 585-7001 (c)
preston.beard@bsee.gov



"Beard, Preston" <preston.beard@bsee.gov>

From: "Beard, Preston" <preston.beard@bsee.gov>
Sent: Thu Nov 08 2018 06:44:45 GMT-0700 (MST)
To: Holly Hopkins <hopkinsh@api.org>
CC: Evan@offshoreoperators.com, Scott Angelle <scott.angelle@bsee.gov>
Subject: Re: [EXTERNAL] Re:

Just Scott and I will attend.

(b) (5) #

On Wed, Nov 7, 2018 at 3:08 PM Holly Hopkins <hopkinsh@api.org> wrote:
Preston,

Can you please let us know who from BSEE will participate in the meeting on Nov 15. Can we also set up a conference line for the meeting? Or we can use mine if you like. With the new date one of our co-chairs can't come to DC in person on Nov 15.

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(571) 585-7001 (c)
preston.beard@bsee.gov



Holly Hopkins <hopkinsh@api.org>

From: Holly Hopkins <hopkinsh@api.org>
Sent: Thu Nov 08 2018 06:50:15 GMT-0700 (MST)
To: "Beard, Preston" <preston.beard@bsee.gov>
CC: "Evan@offshoreoperators.com" <Evan@offshoreoperators.com>, Scott Angelle <scott.angelle@bsee.gov>
Subject: Re: [EXTERNAL] Re:

Ok great thanks

----- Original message -----

From: "Beard, Preston" <preston.beard@bsee.gov>
Date: 11/8/18 8:45 AM (GMT-05:00)
To: Holly Hopkins <hopkinsh@api.org>
Cc: Evan@offshoreoperators.com, Scott Angelle <scott.angelle@bsee.gov>
Subject: Re: [EXTERNAL] Re:

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Conversation Contents

ACT Presentation to Industry

Attachments:

/15. ACT Presentation to Industry/1.1 ACT Intro to Industry Nov 2018 version 4.0 with Sarah Doverspike changes SPD Edits 11.5.18 FINAL.ppt

"Dessauer, Stephen" <stephen.dessauer2@bsee.gov>

From: "Dessauer, Stephen" <stephen.dessauer2@bsee.gov>
Sent: Wed Nov 07 2018 15:20:18 GMT-0700 (MST)
To: Evan Zimmerman <evan@zimmerman-co.com>, Greg Southworth <greg@southworthconsulting.com>
evan@offshoreoperators.com, Rebecca Wolfgang <rebecca@offshoreoperators.com>, "Beard, Preston" <preston.beard@bsee.gov>, angie@offshoreoperators.com,
CC: "Stephen P. Dessauer" <Stephen.Dessauer2@bsee.gov>, "Angelico, Eileen" <eileen.angelico@bsee.gov>
Subject: ACT Presentation to Industry
Attachments: ACT Intro to Industry Nov 2018 version 4.0 with Sarah Doverspike changes SPD Edits 11.5.18 FINAL.ppt

Evan/Greg,

Please see the attached slide pack that I plan on presenting at the OOC meeting in December. Please circulate this to your members. If you or your group have any questions you would like me to answer about the program, please forward them to me by 11/28/18. I will try to incorporate the FAQs into the end of my presentation.

Thank you,

Stephen P. Dessauer

Deputy Regional Supervisor

Regional Field Operations

Bureau of Safety and Environmental Enforcement (BSEE)

Department of the Interior (DOI)

(504) 736-7510

<evan@zimmerman-co.com>

From: <evan@zimmerman-co.com>
Sent: Fri Nov 09 2018 08:28:24 GMT-0700 (MST)
To: "Dessauer, Stephen" <stephen.dessauer2@bsee.gov>, Greg Southworth <greg@southworthconsulting.com>
<evan@offshoreoperators.com>, Rebecca Wolfgang <rebecca@offshoreoperators.com>, "Beard, Preston" <preston.beard@bsee.gov>, <angie@offshoreoperators.com>, "Angelico, Eileen" <eileen.angelico@bsee.gov>
CC:
Subject: [EXTERNAL] RE: ACT Presentation to Industry

Stephen,

Thought it may be beneficial to send questions back in batches that way you don't get them all at the last minute. The first batch of questions/comments:

- Slide 2 bullet 4 – participating operators “minimum criteria to be eligible? Is this limited to the exception criteria mentioned on Slide 3 bullet 2
- Slide 2 bullet 5 – assurance that TIMS will be updated in time to address the potential conversion from INC to Work Order
- Slide 4 bullet 2 – Pilot Program starting 1/1/2019
 - o Data gathering only with no conversion from INC to Work Order?
 - o Length of pilot program?
 - o Benefit to operators participating in Pilot Program?
- Removed reference:
 - o Protocol on maximum number of Work Orders (previous Slides 3 and 4) per facility/year
 - o Increased Oversight List facilities would not be eligible
- Appears they will not make revisions to the current BSEE INC Form
- Any consideration if operator moving forward to expedite and INC correction for conversion to a Work Order. Will any consideration be given if delays due to weather..

Cheers,

Evan H. Zimmerman
Executive Director
Offshore Operators Committee
evan@offshoreoperators.com

----- Original Message -----

Subject: ACT Presentation to Industry
From: "Dessauer, Stephen" <stephen.dessauer2@bsee.gov>
Date: Wed, November 07, 2018 4:20 pm
To: Evan Zimmerman <evan@zimmerman-co.com>, Greg Southworth <greg@southworthconsulting.com>
Cc: <evan@offshoreoperators.com>, Rebecca Wolfgang <rebecca@offshoreoperators.com>, "Beard, Preston" <preston.beard@bsee.gov>, <angie@offshoreoperators.com>, "Stephen P. Dessauer" <Stephen.Dessauer2@bsee.gov>, "Angelico, Eileen" <eileen.angelico@bsee.gov>

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Thank you,

Stephen P. Dessauer

Deputy Regional Supervisor

Regional Field Operations

Bureau of Safety and Environmental Enforcement (BSEE)

Department of the Interior (DOI)

(504) 736-7510

Stephen Dessauer <stephen.dessauer2@bsee.gov>

From: Stephen Dessauer <stephen.dessauer2@bsee.gov>
Sent: Fri Nov 09 2018 10:31:22 GMT-0700 (MST)
To: evan@zimmerman-co.com
CC: Greg Southworth <greg@southworthconsulting.com>, evan@offshoreoperators.com, Rebecca Wolfgang <rebecca@offshoreoperators.com>, "Beard, Preston" <preston.beard@bsee.gov>, angie@offshoreoperators.com, "Angelico, Eileen" <eileen.angelico@bsee.gov>
Subject: Re: [EXTERNAL] RE: ACT Presentation to Industry

Great. Thanks!

Stephen P. Dessauer
Deputy Regional Supervisor
BSEE Regional Field Operations
Sent from my iPad

On Nov 9, 2018, at 9:28 AM, <evan@zimmerman-co.com> <evan@zimmerman-co.com> wrote:

Stephen,

Thought it may be beneficial to send questions back in batches that way you don't get them all at the last minute. The first batch of questions/comments:

- Slide 2 bullet 4 – participating operators “minimum criteria to be eligible? Is this limited to the exception criteria mentioned on Slide 3 bullet 2
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Date: Wed, November 07, 2018 4:20 pm

To: Evan Zimmerman <evan@zimmerman-co.com>, Greg Southworth
<greg@southworthconsulting.com>

Cc: <evan@offshoreoperators.com>, Rebecca Wolfgang

<rebecca@offshoreoperators.com>, "Beard, Preston"

<preston.beard@bsee.gov>, <angie@offshoreoperators.com>, "Stephen P.
Dessauer" <Stephen.Dessauer2@bsee.gov>, "Angelico, Eileen"

<eileen.angelico@bsee.gov>

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Regional Field Operations

Bureau of Safety and Environmental Enforcement (BSEE)

Department of the Interior (DOI)

(504) 736-7510



Bureau of Safety and Environmental Enforcement

Accelerated Compliance Together Program (ACT)

Introduction to Industry
November 2018

“To promote safety, protect the environment and conserve resources offshore through vigorous regulatory oversight and enforcement.”

Accelerated Compliance Together (ACT)

1. BSEE has developed the Accelerated Compliance Together (ACT Program) to incentivize accelerated compliance by OCS operators for minor noncompliances. If the operator corrects these noncompliances within a predetermined accelerated period (shorter than the 14-day period to correct on BSEE Form BSEE-1832), BSEE would reclassify the Incident of Noncompliance (INC) as a “Work Order.”
2. Only select Potential Incidents of Non-Compliance (PINC) with a severity rating of Warning (W) would be eligible for the ACT Program.
3. Non-participating operators would not be penalized for non-participation in this 100% voluntary program.
4. Participating operators would have to meet minimum criteria to be eligible to participate in the ACT program.
5. Conversion from INC to Work Order classification would be automated. BSEE’s IT system would process the conversion from INC to Work Order.

ACT Eligible Operators (Proposed)

1. BSEE would like the ACT Pilot Program to be very inclusive and we encourage as many operators as possible to actively participate.
2. All operators may voluntarily participate in the ACT Program, with the following exceptions:
 - Operators who have had an incident requiring a BSEE Panel Investigation.
 - Operators who are not participating in the BSEE eRecords Initiative.
3. INCs issued to facility(ies) on the BSEE Increased Oversight List (IOL) may be excluded from the ACT Program

ACT Pilot Program

- ACT Pilot Program will start January 1, 2019.
- During the ACT Pilot Program, data will be gathered; however, W INCs will NOT be converted to “Work Orders” even if correction is completed within the accelerated time period.
- The ACT Pilot Program will focus on General Maintenance and Housekeeping Warning level PINCs.
- The selected PINCs for the ACT Pilot Program are as follows:
 - G100 – Facility Signage
 - G101 – Well Signage
 - G110 – Operations in a Safe and Workmanlike Manner
 - G111 – Maintenance of Equipment/Facility
 - G112 – Hazardous Accumulation of Hydrocarbons
 - G250 – Loose Equipment Not Kept in a Suitable Storage Area
 - G251 – Equipment Not Properly Marked
- The selected Warning PINCs make up approximately 40% of all Warning level inspection INCs issued over the last 5 years.

ACT Pilot Program

- ACT Pilot Program PINCs were divided in to 4 buckets:
 - INCs corrected in an average time greater than 30 days have a ACT compliance time of 12 days
 - INCs corrected in an average time between 21-30 days have a ACT compliance time of 10 days
 - INCs corrected in an average time between 13-20 days have a ACT compliance time of 8 days
 - INCs corrected in an average time less than 12 days have a ACT compliance time of 5 days

ACT Pilot Program

- ACT Compliance Time Frame for the PINCs in the Pilot Program (Based on 5 years of Compliance Data)

PINC	ACT Correction Time
G100	12 Days
G101	12 Days
G110	10 Days
G111	12 Days
G112	5 Days
G250	12 Days
G251	8 Days

ACT Pilot Program Goals

1. Assess industry interest in the ACT program.
2. Evaluate industry ability to meet the accelerated compliance goals.
3. Evaluate whether the PINCs selected for the pilot are appropriate.
4. Ensure industry timely receives INC to Work Order reclassifications through BSEE's IT system.

BSEE Website: www.bsee.gov



@BSEEGov



BSEEGov



Bureau of Safety and
Environmental Enforcement



BSEEGov



www.facebook.com/BSEEGov/

“To promote safety, protect the
environment and conserve
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regulatory oversight and
enforcement.”

Conversation Contents

[EXTERNAL] Transmittal of Executed MOA for Chevron and Unocal

Attachments:

/14. [EXTERNAL] Transmittal of Executed MOA for Chevron and Unocal/1.1 Transmittal letter for executed MOA.PDF

/14. [EXTERNAL] Transmittal of Executed MOA for Chevron and Unocal/1.2 Scanned from a Xerox multifunction device.pdf

/14. [EXTERNAL] Transmittal of Executed MOA for Chevron and Unocal/1.3 Scanned from a Xerox multifunction device.pdf

"Gordon, Joe T." <JoeGordon@chevron.com>

From: "Gordon, Joe T." <JoeGordon@chevron.com>
Sent: Fri Nov 09 2018 13:59:43 GMT-0700 (MST)
To: "preston.beard@bsee.gov" <preston.beard@bsee.gov>
CC: "Fury, Sandi" <SFury@chevron.com>
Subject: [EXTERNAL] Transmittal of Executed MOA for Chevron and Unocal
Attachments: Transmittal letter for executed MOA.PDF Scanned from a Xerox multifunction device.pdf Scanned from a Xerox multifunction device.pdf

Good afternoon Mr. Beard,

Attached are the executed MOA for Chevron and Unocal as requested by Director Angelle. If you have any questions or need additional information, please advise.

Thanks

Joe Gordon

Joe Gordon

Regulatory Affairs Sr. Advisor Gulf of Mexico SBU

Chevron North America Exploration and Production Company

(a Chevron U.S.A. Inc division)

100 Northpark Boulevard

Covington, LA 70433

Office # 985-773-6769

Mobile # 985-773-0355

joegordon@chevron.com



Sandi M. Fury

Legislative and Regulatory Affairs Manager, Gulf of Mexico

November 9, 2018

Via E-mail/FedEx

Mr. Preston Beard
Advisor to the BSEE Director
1849 C Street NW Mail Stop 5412
Washington DC 20240

Re: Transmittal of Executed Memorandum of Agreement for Chevron and Unocal

Dear Mr. Beard,

Attached please find the executed Memorandums of Agreement (MOA) for Chevron and Unocal which establish the process to manage the invoicing and reimbursement of costs for inspector lodging and food associated with overnight BSEE inspections. As requested, we are also submitting the completed OMB No. 1510-0056 forms for Chevron and Unocal to the address provided in your letter. Hard copies will be placed in the mail today.

Thank you very much for your efforts to establish and streamline this reimbursement process. If you have any questions or need additional information, please let me know

Regards,

A handwritten signature in black ink, appearing to read "Sandi M. Fury".

Sandi M. Fury

Gulf of Mexico Business Unit

Chevron North America Exploration and Production Company

(a division of Chevron U.S.A. Inc.)

100 Northpark Blvd. Covington, LA 70433

Tel 985 773 6095

SFury@chevron.com

Memorandum of Agreement

The United States Department of the Interior, through the Bureau of Safety and Environmental Enforcement (BSEE), and Chevron U.S.A. Inc., by and through its division, Chevron North America Exploration and Production Company (Operator) (together, Participants) enter into this Memorandum of Agreement (MOA) in order to establish certain understandings and procedures related to reimbursements for BSEE inspector meals and lodging.

Background

In order to fulfill its statutory obligations and mission to promote safety and environmental protection in the context of outer Continental Shelf (OCS) activities, BSEE must conduct periodic on-site inspections of Operator's OCS facilities. Considerations of inspector safety, operational efficiency, and appropriate allocation of taxpayer resources at times require inspectors to stay overnight on Operator's facilities and to consume meals provided by Operator in connection with such stays. BSEE regulations require that Operator provide such meals and lodging upon request, and provide for Operator to request reimbursement. Because Operator's provision of meals and lodging constitutes a benefit to BSEE, government ethics standards create the need to establish a framework for reimbursement. This MOA establishes a vehicle for Operator to request and receive reimbursement for meals and lodging it provides in accordance with BSEE regulations.

Authority

BSEE enters into this agreement under the authority of the Outer Continental Shelf Lands Act, 43 U.S.C. §§ 1331, *et seq.* (including §§ 1334, 1348), 30 CFR Chapter II (including §§ 250.130-250.133, 282.27(d)(2)), Federal Employee Travel, Transportation, and Subsistence legislation (including 5 U.S.C. § 5702), and Federal Travel Regulation System Regulations (including 41 CFR § 301-11.1).

Terms

BSEE and Operator hereby agree to the following terms for providing reimbursement:

1. BSEE and Operator will continue to coordinate and cooperate on inspector lodging and meal needs.
2. On a quarterly basis, BSEE will prepare and provide to Operator a summary report identifying the number of overnight stays by BSEE inspectors on Operator's OCS facilities during the previous calendar quarter, as well as the number of meals consumed, by category, in connection with such overnight stays.
3. Following receipt of BSEE's report, Operator will issue an invoice to BSEE for the meals and lodging identified in the BSEE report. Invoices shall be sent to:

Bureau of Safety and Environmental Enforcement
45600 Woodland Road
Finance VAE-FD
Sterling, VA 20166

Prior to payment being made, Operator will need submit the attached OMB No. 1510-0056 *ACH VENDOR/MISCELLANEOUS PAYMENT ENROLLMENT FORM*, to the above address. This form may be submitted with the first request for payment, and does not need to be submitted for subsequent payment requests unless vendor or banking information changes.

4. Operator will invoice BSEE \$94 for each night of lodging. Operator will invoice BSEE for meals provided during the inspector's stay as follows: \$13 for each breakfast; \$14 for each lunch; and \$23 for each dinner. These rates reflect the current reimbursement rates established by federal law for lodging and meals for federal employees in travel status for the selected geographic area; they are subject to adjustment at any time without advance notice in order to remain consistent with changes to the applicable rates under the law. Operator agrees that these amounts represent a valid and reasonable approximation of its actual costs for providing these services.
5. Following receipt of an invoice that aligns with BSEE's report and the terms of this MOA, BSEE will issue payment to Operator.

Contacts

As noted above, invoices should be provided to BSEE at:

Bureau of Safety and Environmental Enforcement
45600 Woodland Road
Finance VAE-FD
Sterling, VA 20166

Reports and payments should be provided to Operator at:

Chevron U.S.A. Inc., by and through its division, Chevron North America Exploration and Production Company
Renee Lang
100 Northpark Blvd
Covington, LA 70433

General Provisions

Nothing in this MOA alters, amends, or affects in any way the statutory or regulatory authority of BSEE. As required by the Anti-deficiency Act, 31 U.S.C. §§ 1341 and 1342, all commitments made by BSEE in this MOA are subject to the availability of appropriated funds and budget priorities. Nothing in this MOA, in and of itself, obligates BSEE to expend appropriations, to enter into any contract, or to incur financial obligations. Any transaction involving the transfer of funds between Participants will be handled in accordance with applicable laws, regulations, and procedures.

This MOA is not intended to, nor does it, create any right, benefit, or trust responsibility, substantive or procedural, enforceable at law or equity by any person or party against the United States, its agencies, its officers, or any other person. This MOA neither expands nor is in derogation of those powers and authorities vested in BSEE by applicable law. Nothing in this MOA is intended to conflict with current law or regulation or the directives of BSEE. If a term of this MOA is inconsistent with such authority, that term is invalid, but the remaining terms and conditions of this MOA will remain in full force and effect.

Term and Termination

This MOA will become effective upon the date of the last Participant's signature below and will continue until canceled or superseded. Amendments to this MOA may be made by the mutual, written consent of authorized representatives of each of the Participants. Any Participant may terminate this MOA, in whole or in part, at any time by providing the other Participant 30-days written notice to that effect.

Mr. Scott Angelle
Director
Bureau of Safety Environmental Enforcement
U.S. Department of the Interior



R.G. Schneider
Assistant Secretary
Chevron U.S.A. Inc., by and through its division,
Chevron North America Exploration and Production
Company

Conversation Contents

[EXTERNAL] Automatic reply: ?Attendees for Thursday Meeting w/OOC & API

Holly Hopkins <hopkinsh@api.org>

From: Holly Hopkins <hopkinsh@api.org>
Sent: Tue Nov 13 2018 08:10:47 GMT-0700 (MST)
To: Preston Beard <preston.beard@bsee.gov>
Subject: [EXTERNAL] Automatic reply: ?Attendees for Thursday Meeting w/OOC & API

I am currently out of the office on business travel until Wednesday, November 14, 2018. I will respond to your message as soon as possible. Thanks, have a great day!

Conversation Contents

?Attendees for Thursday Meeting w/OOC & API

"Mcbrady, Monica" <monica.mcbrady@bsee.gov>

From: "Mcbrady, Monica" <monica.mcbrady@bsee.gov>
Sent: Tue Nov 13 2018 08:08:28 GMT-0700 (MST)
To: Preston Beard <preston.beard@bsee.gov>, Staci King <staci.king@bsee.gov>
Subject: ?Attendees for Thursday Meeting w/OOC & API

Staci called about this Thursday's meeting with OOC & API. I dug around and found these two contacts on the email trail about the meeting.

Do you know if anyone else is going to come to the meeting beside Evan and Holly?

I'll forward her this info to get her started. If you know of anyone else coming, kindly let Staci know and she'll prep the welcome poster.

Evan H. Zimmerman
Executive Director
Offshore Operators Committee
Evan@offshoreoperators.com

Holly A. Hopkins
Sr. Policy Advisor, Upstream
American Petroleum Institute
1220 L Street, NW
Washington, DC 20005
202-682-8439 Tel
(b) (6) Cell
hopkinsh@api.org
cid:image00

--

Monica McBrady
Office of the Director
Bureau of Safety and Environmental Enforcement
(202) 208-6286 (o)
(571) 789-6399 (c)
monica.mcbrady@bsee.gov

Preston Beard <preston.beard@bsee.gov>

From: Preston Beard <preston.beard@bsee.gov>
Sent: Tue Nov 13 2018 08:10:32 GMT-0700 (MST)
To: "Mcbrady, Monica" <monica.mcbrady@bsee.gov>
CC: Staci King <staci.king@bsee.gov>, Holly Hopkins <hopkinsh@api.org>
Subject: Re: ?Attendees for Thursday Meeting w/OOC & API

Holly, can you send us your attendees?

-Preston
571-585-7001

On Nov 13, 2018, at 10:08 AM, Mcbrady, Monica <monica.mcbrady@bsee.gov> wrote:

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monica.mcbrady@bsee.gov

"Beard, Preston" <preston.beard@bsee.gov>

From: "Beard, Preston" <preston.beard@bsee.gov>
Sent: Wed Nov 14 2018 07:10:39 GMT-0700 (MST)
To: Monica Mcbrady <monica.mcbrady@bsee.gov>, Evan@offshoreoperators.com
CC: Staci King <staci.king@bsee.gov>, Holly Hopkins <hopkinsh@api.org>
Subject: Re: ?Attendees for Thursday Meeting w/OOC & API

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(202) 208-3976 (o)
(571) 585-7001 (c)
preston.beard@bsee.gov



Holly Hopkins <hopkinsh@api.org>

From: Holly Hopkins <hopkinsh@api.org>
Sent: Wed Nov 14 2018 07:16:13 GMT-0700 (MST)
To: "Beard, Preston" <preston.beard@bsee.gov>, Monica Mcbrady <monica.mcbrady@bsee.gov>, "Evan@offshoreoperators.com" <Evan@offshoreoperators.com>
CC: Staci King <staci.king@bsee.gov>
Subject: [EXTERNAL] Re: ?Attendees for Thursday Meeting w/OOC & API

Me, Evan and Greg Kusinski, Chevron. We will be there at 2 pm. Thanks

----- Original message -----

From: "Beard, Preston" <preston.beard@bsee.gov>
Date: 11/14/18 9:11 AM (GMT-05:00)
To: Monica Mcbrady <monica.mcbrady@bsee.gov>, Evan@offshoreoperators.com
Cc: Staci King <staci.king@bsee.gov>, Holly Hopkins <hopkinsh@api.org>
Subject: Re: ?Attendees for Thursday Meeting w/OOC & API

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"Beard, Preston" <preston.beard@bsee.gov>

From: "Beard, Preston" <preston.beard@bsee.gov>
Sent: Wed Nov 14 2018 07:17:59 GMT-0700 (MST)
To: Eileen Angelico <eileen.angelico@bsee.gov>
CC: Staci King <staci.king@bsee.gov>
Subject: Re: [EXTERNAL] Re: ?Attendees for Thursday Meeting w/OOC & API

Making sure you saw this.

On Wed, Nov 14, 2018 at 9:16 AM Holly Hopkins <hopkinsh@api.org> wrote:
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----- Original message -----

From: "Beard, Preston" <preston.beard@bsee.gov>
Date: 11/14/18 9:11 AM (GMT-05:00)
To: Monica Mcbrady <monica.mcbrady@bsee.gov>, Evan@offshoreoperators.com
Cc: Staci King <staci.king@bsee.gov>, Holly Hopkins <hopkinsh@api.org>
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preston.beard@bsee.gov



"King, Staci" <staci.king@bsee.gov>

From: "King, Staci" <staci.king@bsee.gov>
Sent: Wed Nov 14 2018 07:31:19 GMT-0700 (MST)
To: Preston Beard <preston.beard@bsee.gov>

CC: Eileen Angelico <eileen.angelico@bsee.gov>
Subject: Re: [EXTERNAL] Re: ?Attendees for Thursday Meeting w/OOC & API

Hi Preston - please remember that you approved having just Holly & Evan on the poster yesterday and I've already requested they be printed this morning.

However, I will do my best.

Please clarify what change(s) should be made -

Is Mr. Kusinski representing Chevron?

Should the sign title read:

Offshore Operators Committee, American Petroleum Institute and Chevron are visiting BSEE today

Or just include Mr. Kusinski in the role description in the body of the poster?

Staci King

Public Engagement & Intergovernmental Affairs Manager

Bureau of Safety & Environmental Enforcement

45600 Woodland Road, Sterling, VA 20166

Office 703-787-1620 Mobile 571-344-3747 staci.king@bsee.gov

Every day is the best day to thank a veteran and their family for serving.



On Wed, Nov 14, 2018 at 9:18 AM Beard, Preston <preston.beard@bsee.gov> wrote:
Making sure you saw this.

On Wed, Nov 14, 2018 at 9:16 AM Holly Hopkins <hopkinsh@api.org> wrote:
Me, Evan and Greg Kusinski, Chevron. We will be there at 2 pm. Thanks

----- Original message -----

From: "Beard, Preston" <preston.beard@bsee.gov>

Date: 11/14/18 9:11 AM (GMT-05:00)

To: Monica Mcbrady <monica.mcbrady@bsee.gov>, Evan@offshoreoperators.com

Cc: Staci King <staci.king@bsee.gov>, Holly Hopkins <hopkinsh@api.org>

Subject: Re: ?Attendees for Thursday Meeting w/OOC & API

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"Beard, Preston" <preston.beard@bsee.gov>

From: "Beard, Preston" <preston.beard@bsee.gov>
Sent: Wed Nov 14 2018 07:33:20 GMT-0700 (MST)
To: Staci King <staci.king@bsee.gov>
CC: Eileen Angelico <eileen.angelico@bsee.gov>
Subject: Re: [EXTERNAL] Re: ?Attendees for Thursday Meeting w/OOC & API

The sign should read:

Offshore Operators Committee, American Petroleum Institute and Chevron are visiting BSEE today

On Wed, Nov 14, 2018 at 9:31 AM King, Staci <staci.king@bsee.gov> wrote:

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45600 Woodland Road, Sterling, VA 20166

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To: Monica Mcbrady <monica.mcbrady@bsee.gov>, Evan@offshoreoperators.com

Cc: Staci King <staci.king@bsee.gov>, Holly Hopkins <hopkinsh@api.org>

Subject: Re: ?Attendees for Thursday Meeting w/OOC & API

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Conversation Contents

Fwd: [EXTERNAL] ACT meeting in NOLA

Attachments:

/11. Fwd: [EXTERNAL] ACT meeting in NOLA/5.1 OOC GM Agenda - December 2018 (Final).pdf

"Gray, Tiffany" <tiffany.gray@bsee.gov>

From: "Gray, Tiffany" <tiffany.gray@bsee.gov>
Sent: Fri Nov 30 2018 07:03:40 GMT-0700 (MST)
To: "Beard, Preston" <preston.beard@bsee.gov>
Subject: Fwd: [EXTERNAL] ACT meeting in NOLA

Do we have a contact at OOC that might have more info about the OOC meeting next week, perhaps an agenda? I have zero idea about the agenda or what time BSEE will be presenting about the ACT program.

Thanks!

Tiffany Gray
Public Affairs Specialist
Bureau of Safety and Environmental Enforcement
Office: (202) 208 - 4378
Mobile: (202) 803 - 1886
tiffany.gray@bsee.gov



----- Forwarded message -----

From: Kate Kaufman <kkaufman@hilcorp.com>
Date: Thu, Nov 29, 2018 at 5:30 PM
Subject: RE: [EXTERNAL] ACT meeting in NOLA
To: Gray, Tiffany <tiffany.gray@bsee.gov>

Hi Tiffany,

Do you happen to have an agenda for the OOC meeting next week, or know what time BSEE is presenting? Or, could you put me in touch with an OOC representative who might have an agenda?

Thank you!

Kate Kaufman | Liberty Development Permitting Lead | Hilcorp Alaska, LLC
O: 907-777-8329 | C: (b) (6) | kkaufman@hilcorp.com
3800 Centerpoint Dr., Ste 1400 | Anchorage | AK | 99503

From: Gray, Tiffany [mailto:tiffany.gray@bsee.gov]
Sent: Tuesday, November 27, 2018 12:25 PM
To: Justin Furnace
Cc: Kate Kaufman
Subject: Re: [EXTERNAL] ACT meeting in NOLA

Thank you very much, Mr. Furnace. We look forward to seeing you and Ms. Kaufman next week.

My apologies for the late reply; I have been on annual leave and it appears that my out-of-office message was not working.

Tiffany Gray
Public Affairs Specialist
Bureau of Safety and Environmental Enforcement
Office: (202) 208 - 4378
Mobile: (202) 803 - 1886
tiffany.gray@bsee.gov



On Tue, Nov 13, 2018 at 3:05 PM Justin Furnace <jfurnace@hilcorp.com> wrote:

Hi Tiffany. I am responding to the letter and email from Director Angelle to Greg Lalicker regarding the December 5th meeting in New Orleans for the ACT program.

Both I and Kate Kaufman, from our Alaska office, would like to participate in the program. Kate will be planning to attend the meeting on Dec. 5th. I have cc'ed her to this email. Please forward any details regarding the meeting and agenda when they become available. Thanks!

Justin Furnace | Director of Government and Public Affairs | Hilcorp Energy Company
O: 713.289.2735 | C: (b) (6) | jfurnace@hilcorp.com
1111 Travis | Houston | Texas | 77002

Hilcorp Energy Company's address is 1111 Travis St, Houston, TX 77002

"Beard, Preston" <preston.beard@bsee.gov>

From: "Beard, Preston" <preston.beard@bsee.gov>
Sent: Fri Nov 30 2018 07:12:17 GMT-0700 (MST)
To: Tiffany Gray <tiffany.gray@bsee.gov>, Evan@offshoreoperators.com
Subject: Re: [EXTERNAL] ACT meeting in NOLA

Evan, can you help?

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(571) 585-7001 (c)
preston.beard@bsee.gov



Evan Zimmerman <evan@zimmerman-co.com>

From: Evan Zimmerman <evan@zimmerman-co.com>
Sent: Fri Nov 30 2018 07:35:30 GMT-0700 (MST)
To: "Beard, Preston" <preston.beard@bsee.gov>
Tiffany Gray <tiffany.gray@bsee.gov>,
CC: <Evan@offshoreoperators.com>,
<angie@offshoreoperators.com>
Subject: Re: [EXTERNAL] ACT meeting in NOLA

Yes, Angie will email you the final agenda this morning.

Cheers,

Evan H. Zimmerman
Executive Director
Offshore Operators Committee
Evan@offshoreoperators.com

On Nov 30, 2018, at 8:12 AM, Beard, Preston <preston.beard@bsee.gov> wrote:

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Cc: Kate Kaufman
Subject: Re: [EXTERNAL] ACT meeting in NOLA

Thank you very much, Mr. Furnace. We look forward to seeing you and Ms. Kaufman next week.

My apologies for the late reply; I have been on annual leave and it appears that my out-of-office message was not working.

Tiffany Gray
Public Affairs Specialist
Bureau of Safety and Environmental Enforcement
Office: (202) 208 - 4378
Mobile: (202) 803 - 1886
tiffany.gray@bsee.gov



On Tue, Nov 13, 2018 at 3:05 PM Justin Furnace <jfurnace@hilcorp.com> wrote:

Hi Tiffany. I am responding to the letter and email from Director Angelle to Greg Lalicker regarding the December 5th meeting in New Orleans for the ACT program.

Both I and Kate Kaufman, from our Alaska office, would like to participate in the program. Kate will be planning to attend the meeting on Dec. 5th. I have cc'ed her to this email. Please forward any details regarding the meeting and agenda when they become available. Thanks!

Justin Furnace | Director of Government and Public Affairs | Hilcorp Energy Company
O: 713.289.2735 | C: (b) (6) | jfurnace@hilcorp.com
1111 Travis | Houston | Texas | 77002

Hilcorp Energy Company's address is 1111 Travis St, Houston, TX 77002

—
Preston Beard
Advisor, Office of the Director
Bureau of Safety and Environmental Enforcement
(202) 208-3976 (o)
(571) 585-7001 (c)
preston.beard@bsee.gov



"Gray, Tiffany" <tiffany.gray@bsee.gov>

From: "Gray, Tiffany" <tiffany.gray@bsee.gov>
Sent: Fri Nov 30 2018 07:36:35 GMT-0700 (MST)
To: evan@zimmerman-co.com
CC: "Beard, Preston" <preston.beard@bsee.gov>, Evan@offshoreoperators.com, angie@offshoreoperators.com
Subject: Re: [EXTERNAL] ACT meeting in NOLA

Perfect. Thank you, Preston and Evan!

Tiffany Gray

Public Affairs Specialist
Bureau of Safety and Environmental Enforcement
Office: (202) 208 - 4378
Mobile: (202) 803 - 1886
tiffany.gray@bsee.gov



On Fri, Nov 30, 2018 at 9:35 AM Evan Zimmerman <evan@zimmerman-co.com> wrote:
Yes, Angie will email you the final agenda this morning.

Cheers,

Evan H. Zimmerman
Executive Director
Offshore Operators Committee
Evan@offshoreoperators.com

On Nov 30, 2018, at 8:12 AM, Beard, Preston <preston.beard@bsee.gov> wrote:

Evan, can you help?

On Fri, Nov 30, 2018 at 9:03 AM Gray, Tiffany <tiffany.gray@bsee.gov> wrote:
Do we have a contact at OOC that might have more info about the OOC meeting next week, perhaps an agenda? I have zero idea about the agenda or what time BSEE will be presenting about the ACT program.

Thanks!

Tiffany Gray

Public Affairs Specialist
Bureau of Safety and Environmental Enforcement
Office: (202) 208 - 4378
Mobile: (202) 803 - 1886
tiffany.gray@bsee.gov



----- Forwarded message -----

From: **Kate Kaufman** <kkaufman@hilcorp.com>
Date: Thu, Nov 29, 2018 at 5:30 PM
Subject: RE: [EXTERNAL] ACT meeting in NOLA
To: Gray, Tiffany <tiffany.gray@bsee.gov>

Hi Tiffany,

Do you happen to have an agenda for the OOC meeting next week, or know what time

BSEE is presenting? Or, could you put me in touch with an OOC representative who might have an agenda?

Thank you!

Kate Kaufman | Liberty Development Permitting Lead | Hilcorp Alaska, LLC
O: 907-777-8329 | C: (b) (6) | kkaufman@hilcorp.com
3800 Centerpoint Dr., Ste 1400 | Anchorage | AK | 99503

From: Gray, Tiffany [<mailto:tiffany.gray@bsee.gov>]
Sent: Tuesday, November 27, 2018 12:25 PM
To: Justin Furnace
Cc: Kate Kaufman
Subject: Re: [EXTERNAL] ACT meeting in NOLA

Thank you very much, Mr. Furnace. We look forward to seeing you and Ms. Kaufman next week.

My apologies for the late reply; I have been on annual leave and it appears that my out-office message was not working.

Tiffany Gray
Public Affairs Specialist
Bureau of Safety and Environmental Enforcement
Office: (202) 208 - 4378
Mobile: (202) 803 - 1886
tiffany.gray@bsee.gov



On Tue, Nov 13, 2018 at 3:05 PM Justin Furnace <jfurnace@hilcorp.com> wrote:

Hi Tiffany. I am responding to the letter and email from Director Angelle to Greg Lalicker regarding the December 5th meeting in New Orleans for the ACT program.

Both I and Kate Kaufman, from our Alaska office, would like to participate in the program. Kate will be planning to attend the meeting on Dec. 5th. I have cc'ed her to this email. Please forward any details regarding the meeting and agenda when they become available. Thanks!

Justin Furnace | Director of Government and Public Affairs| Hilcorp Energy Company
O: 713.289.2735 | C: (b) (6) | jfurnace@hilcorp.com
1111 Travis| Houston | Texas | 77002

Hilcorp Energy Company's address is 1111 Travis St, Houston, TX 77002

Bureau of Safety and Environmental Enforcement
(202) 208-3976 (o)
(571) 585-7001 (c)
preston.beard@bsee.gov



Angie Barbara <angie@offshoreoperators.com>

From: Angie Barbara <angie@offshoreoperators.com>
Sent: Fri Nov 30 2018 08:36:44 GMT-0700 (MST)
To: "Beard, Preston" <preston.beard@bsee.gov>
CC: Tiffany Gray <tiffany.gray@bsee.gov>, Evan Zimmerman <evan@zimmerman-co.com>
Subject: Re: [EXTERNAL] ACT meeting in NOLA
Attachments: OOC GM Agenda - December 2018 (Final).pdf

Good Morning,

Attached is the OOC General Meeting Agenda. Please let me know if you have any questions.

Have a wonderful weekend!

Angie Barbara
Member Support Manager
Offshore Operators Committee

Office: 504-904-7966
Cell: (b) (6)
www.theooc.org

From: "Evan Zimmerman" <evan@zimmerman-co.com>
Sent: Friday, November 30, 2018 8:35 AM
To: "Beard, Preston" <preston.beard@bsee.gov>
Cc: "Tiffany Gray" <tiffany.gray@bsee.gov>, Evan@offshoreoperators.com, angie@offshoreoperators.com
Subject: Re: [EXTERNAL] ACT meeting in NOLA

Yes, Angie will email you the final agenda this morning.

Cheers,

Evan H. Zimmerman
Executive Director
Offshore Operators Committee
Evan@offshoreoperators.com

On Nov 30, 2018, at 8:12 AM, Beard, Preston <preston.beard@bsee.gov> wrote:

Evan, can you help?

On Fri, Nov 30, 2018 at 9:03 AM Gray, Tiffany <tiffany.gray@bsee.gov> wrote:

Do we have a contact at OOC that might have more info about the OOC meeting next week, perhaps an agenda? I have zero idea about the agenda or what time BSEE will be presenting about the ACT program.

Thanks!

Tiffany Gray
Public Affairs Specialist
Bureau of Safety and Environmental Enforcement
Office: (202) 208 - 4378
Mobile: (202) 803 - 1886
tiffany.gray@bsee.gov



----- Forwarded message -----

From: **Kate Kaufman** <kkaufman@hilcorp.com>
Date: Thu, Nov 29, 2018 at 5:30 PM
Subject: RE: [EXTERNAL] ACT meeting in NOLA
To: Gray, Tiffany <tiffany.gray@bsee.gov>

Hi Tiffany,

Do you happen to have an agenda for the OOC meeting next week, or know what time BSEE is presenting? Or, could you put me in touch with an OOC representative who might have an agenda?

Thank you!

Kate Kaufman | Liberty Development Permitting Lead | Hilcorp Alaska, LLC
O: 907-777-8329 | C: (b) (6) | kkaufman@hilcorp.com
3800 Centerpoint Dr., Ste 1400 | Anchorage | AK | 99503

From: Gray, Tiffany [<mailto:tiffany.gray@bsee.gov>]
Sent: Tuesday, November 27, 2018 12:25 PM
To: Justin Furnace
Cc: Kate Kaufman
Subject: Re: [EXTERNAL] ACT meeting in NOLA

Thank you very much, Mr. Furnace. We look forward to seeing you and Ms. Kaufman next week.

My apologies for the late reply; I have been on annual leave and it appears that my out-of-office message was not working.

Tiffany Gray
Public Affairs Specialist
Bureau of Safety and Environmental Enforcement
Office: (202) 208 - 4378
Mobile: (202) 803 - 1886
tiffany.gray@bsee.gov



On Tue, Nov 13, 2018 at 3:05 PM Justin Furnace <jfurnace@hilcorp.com> wrote:

Hi Tiffany. I am responding to the letter and email from Director Angelle to Greg

Lalicker regarding the December 5th meeting in New Orleans for the ACT program.

Both I and Kate Kaufman, from our Alaska office, would like to participate in the program. Kate will be planning to attend the meeting on Dec. 5th. I have cc'ed her to this email. Please forward any details regarding the meeting and agenda when they become available. Thanks!

Justin Furnace | Director of Government and Public Affairs| Hilcorp Energy Company
O: 713.289.2735 | C: (b) (6) | jfurnace@hilcorp.com
1111 Travis| Houston | Texas | 77002

Hilcorp Energy Company's address is 1111 Travis St, Houston, TX 77002

Preston Beard
Advisor, Office of the Director
Bureau of Safety and Environmental Enforcement
(202) 208-3976 (o)
(571) 585-7001 (c)
preston.beard@bsee.gov



"Gray, Tiffany" <tiffany.gray@bsee.gov>

From: "Gray, Tiffany" <tiffany.gray@bsee.gov>
Sent: Fri Nov 30 2018 08:40:30 GMT-0700 (MST)
To: angie@offshoreoperators.com
CC: "Beard, Preston" <preston.beard@bsee.gov>, evan@zimmerman-co.com
Subject: Re: [EXTERNAL] ACT meeting in NOLA

Thank you very much, Angie.

Tiffany Gray
Public Affairs Specialist
Bureau of Safety and Environmental Enforcement
Office: (202) 208 - 4378
Mobile: (202) 803 - 1886
tiffany.gray@bsee.gov



On Fri, Nov 30, 2018 at 10:37 AM Angie Barbara <angie@offshoreoperators.com> wrote:
Good Morning,

Attached is the OOC General Meeting Agenda. Please let me know if you have any questions.

Have a wonderful weekend!

Angie Barbara
Member Support Manager
Offshore Operators Committee

Office: 504-904-7966
Cell: (b) (6)
www.theooc.org

From: "Evan Zimmerman" <evan@zimmerman-co.com>
Sent: Friday, November 30, 2018 8:35 AM
To: "Beard, Preston" <preston.beard@bsee.gov>
Cc: "Tiffany Gray" <tiffany.gray@bsee.gov>, Evan@offshoreoperators.com, angie@offshoreoperators.com
Subject: Re: [EXTERNAL] ACT meeting in NOLA

Yes, Angie will email you the final agenda this morning.

Cheers,

Evan H. Zimmerman
Executive Director
Offshore Operators Committee
Evan@offshoreoperators.com

On Nov 30, 2018, at 8:12 AM, Beard, Preston <preston.beard@bsee.gov> wrote:

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Do we have a contact at OOC that might have more info about the OOC meeting next week, perhaps an agenda? I have zero idea about the agenda or what time BSEE will be presenting about the ACT program.

Thanks!

Tiffany Gray
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Bureau of Safety and Environmental Enforcement
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Mobile: (202) 803 - 1886
tiffany.gray@bsee.gov



----- Forwarded message -----
From: Kate Kaufman <kkaufman@hilcorp.com>
Date: Thu, Nov 29, 2018 at 5:30 PM
Subject: RE: [EXTERNAL] ACT meeting in NOLA
To: Gray, Tiffany <tiffany.gray@bsee.gov>

Hi Tiffany,

Do you happen to have an agenda for the OOC meeting next week, or know what time BSEE is presenting? Or, could you put me in touch with an OOC representative who might have an agenda?

Thank you!

Kate Kaufman | Liberty Development Permitting Lead | Hilcorp Alaska, LLC
O: 907-777-8329 | C: (b) (6) | kkaufman@hilcorp.com
3800 Centerpoint Dr., Ste 1400 | Anchorage | AK | 99503

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Subject: Re: [EXTERNAL] ACT meeting in NOLA

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Tiffany Gray
Public Affairs Specialist
Bureau of Safety and Environmental Enforcement
Office: (202) 208 - 4378
Mobile: (202) 803 - 1886
tiffany.gray@bsee.gov



On Tue, Nov 13, 2018 at 3:05 PM Justin Furnace <jfurnace@hilcorp.com> wrote:

Hi Tiffany. I am responding to the letter and email from Director Angelle to Greg Lalicker regarding the December 5th meeting in New Orleans for the ACT program.

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Justin Furnace | Director of Government and Public Affairs | Hilcorp Energy Company
O: 713.289.2735 | C: (b) (6) | jfurnace@hilcorp.com
1111 Travis | Houston | Texas | 77002

Hilcorp Energy Company's address is 1111 Travis St, Houston, TX 77002

Preston Beard
Advisor, Office of the Director
Bureau of Safety and Environmental Enforcement
(202) 208-3976 (o)
(571) 585-7001 (c)
preston.beard@bsee.gov





OFFSHORE OPERATORS COMMITTEE

OOO General Meeting Agenda

December 5th, 2018

The Westin Canal Place Hotel
New Orleans, LA

7:30 – 8:00	Registration & Continental Breakfast
8:00 – 8:10	Welcome, Safety Briefing, Antitrust
8:10 – 8:15	Safety Moment
8:15 – 9:00	Operator's Perspective – Richard Tallant, <i>Shell</i>
9:00 – 9:20	Directors Report / Treasurer's Report
9:20 – 10:05	BSEE Accelerate Compliance Together (ACT) Program, <i>Stephen Dessauer, Section Chief</i>
10:05 – 10:35	Break
10:35 – 11:20	EPA Update – <i>Anne L. Idsal, Regional Administrator, Region 6</i>
11:20 – 11:55	Subcommittee Reports – <i>Environmental, Air Quality, Water Quality & Waste, SEMS & Marine Safety and Security</i>
11:55 – 12:55	Lunch
12:55 – 1:00	Most Valuable Operator Award
1:00 – 1:20	Recognitions
1:20 – 1:35	DOE Update – <i>Elena Melchert, Director Upstream Research</i>
1:35 – 2:20	GOM Regional Regulatory Panel <i>Lars Herbst, BSEE GOM Regional Director</i> <i>Mike Celata, BOEM GOM Regional Director</i> <i>Captain Russell Holmes, USCG D8 OCS Officer in Charge of Marine Inspection</i>
2:20 – 2:50	Break
2:50 – 3:25	Subcommittee Reports – <i>Drilling, Technical, Platform, Pipeline, eGov, Fisheries</i>
3:25 – 3:55	NOIA Washington Update – <i>Tim Charters, VP of Governmental and Political Affairs</i>
3:55 – 4:10	DeepStar – <i>Joe Gomes, Project Manager</i>
4:10 – 4:25	Blockchain – <i>Rebecca Hofmann, US Blockchain Strategy & Innovation</i>
4:25 – 4:30	Closing, Adjourn
4:30 – 6:00	Cocktail Reception & Networking



Conversation Contents

Dec 5 meeting

"Beard, Preston" <preston.beard@bsee.gov>

From: "Beard, Preston" <preston.beard@bsee.gov>
Sent: Thu Dec 06 2018 14:19:27 GMT-0700 (MST)
To: Evan@offshoreoperators.com
Subject: Dec 5 meeting

Hey Evan,

Can you loop me in on how many operators attended the meeting? Thank you sir !

--

Preston Beard
Advisor, Office of the Director
Bureau of Safety and Environmental Enforcement
(202) 208-3976 (o)
(571) 585-7001 (c)
preston.beard@bsee.gov



Conversation Contents

[EXTERNAL] RE: Dec 5 meeting

Attachments:

/9. [EXTERNAL] RE: Dec 5 meeting/1.1 OOC General Meeting Registrants.xls

<evan@zimmerman-co.com>

From: <evan@zimmerman-co.com>
Sent: Thu Dec 06 2018 15:03:38 GMT-0700 (MST)
To: "Beard, Preston" <preston.beard@bsee.gov>
Subject: [EXTERNAL] RE: Dec 5 meeting
Attachments: OOC General Meeting Registrants.xls

Preston,

Attached shows you all that attended and titles/positions/etc.

Cheers,

Evan H. Zimmerman
Executive Director
Offshore Operators Committee
evan@offshoreoperators.com

----- Original Message -----

Subject: Dec 5 meeting
From: "Beard, Preston" <preston.beard@bsee.gov>
Date: Thu, December 06, 2018 3:19 pm
To: <Evan@offshoreoperators.com>

Hey Evan,

Can you loop me in on how many operators attended the meeting? Thank you sir !

--

Preston Beard
Advisor, Office of the Director
Bureau of Safety and Environmental Enforcement
(202) 208-3976 (o)
(571) 585-7001 (c)
preston.beard@bsee.gov



Ordered by	Ticket type	Email	Company	Position / Title	Membership
Cidney Christie	OOO Member Registration	cidney.christie@shell.com	Shell	Sr. Environmental Engineer	OOO
Jonathan Hunter	OOO Member Registration	jhunter@joneswalker.com	Jones Walker LLC	Partner	OOO
Henry Welch	OOO Member Registration	hwelch@ankorenergy.com	ANKOR Energy, LLC	Chief Operating Officer	OOO
Henry Welch	OOO Member Registration	hwelch@ankorenergy.com	ANKOR Energy, LLC	Chief Operating Officer	OOO
Carly Moss	Subcommittee Chair or Co-Chair	carly.moss@chevron.com	Chevron	Chevron	OOO
Sandi Fury	Subcommittee Chair or Co-Chair	sfury@chevron.com	Chevron	Chevron	OOO
Robert Holden	OOO Member Registration	bholden@joneswalker.com	Jones Walker	Attorney	OOO
Ryan Cantor	OOO Member Registration	rcantor@arenaoffshore.com	Arena Offshore, LP	Pipeline Engineer	OOO
Rafael Flores	Subcommittee Chair or Co-Chair	rafael.flores1@bp.com	BP	BP	OOO
Lindsey Johnson	Early Non-OOO Member	ljohnson@loopergoodwine.com	Looper Goodwine	Associate	OOO
Lindsey Johnson	Early Non-OOO Member	ljohnson@loopergoodwine.com	Looper Goodwine	Associate	OOO
Beth Atwood	Government / Invited Speaker	Beth.Atwood@bp.com	BP	Regulatory Permit Advisor	OOO
Caroline Looke	OOO Member Registration	clooke@walteroil.com	Walter Oil & Gas Corporation	Petroleum Engineer	OOO
Rumaldo Cortez	OOO Member Registration	rcortez@petrobras.com	Petrobras America	HSES Operations Supervisor	OOO
Will Pecue	OOO Member Registration	wpecue@tayloenergy.com	Taylor Energy Company LLC	President	OOO
Tad LeBlanc	Government / Invited Speaker	tleblanc@sempcheck.com	SEMPCheck Services	Senior Vice President	OOO
Joel Plauche	Subcommittee Chair or Co-Chair	joel.plauche@fwelc.com	Fieldwood Energy	VP HSE/Reg	OOO
Eileen Hughes	OOO Member Registration	eileen.hughes@bhpbilliton.com	BHP	HSE Manager	OOO
Sarah Doverspike	Government / Invited Speaker	sarah.doverspike@sol.doi.gov	DOI	DOI	OOO
Blair Spencer	Subcommittee Chair or Co-Chair	Blair.spencer@cantium.us	Cantium	Cantium	OOO
Allison Godwin	Government / Invited Speaker	agodwin@isn.com	ISN	ISN	OOO
Valerie Scheef	Government / Invited Speaker	VScheef@isn.com	ISN	ISN	OOO
Christina Clements	Subcommittee Chair or Co-Chair	christina.clements@cantium.us	Cantium	Cantium	OOO
Chad Williams	Subcommittee Chair or Co-Chair	chad.williams@cantium.us	Cantium	Cantium	OOO
Lynne Hackedorn	OOO Member Registration	lynne.hackedorn@mogus.com	Marubeni Oil & Gas (USA) LLC	Land and Regulatory Consultant	OOO
Elizabeth Komiskey	OOO Member Registration	Elizabeth.komiskey@bp.com	BP	Regulatory Compliance and Environment Manager	OOO
Todd Cantrall	Early Non-OOO Member	Srosales@fmi.com	FMOG	Vice President	OOO
Todd Cantrall	Government - Pay for Lunch	Srosales@fmi.com	FMOG	Vice President	OOO
Kathryn Kaufman	Early Non-OOO Member	kkaufman@hilcorp.com	Hilcorp	Regulatory Coordinator	OOO
Roland Moreau	Government / Invited Speaker	(b) (6)	BTS- SafeOCS	Consultant	OOO
JOEY CANNATA	OOO Member Registration	TAL.OFFICE@TANKSALOTINC.NET	Tanks-A-Lot Inc	General Manager	OOO
JOEY CANNATA	OOO Member Registration	TAL.OFFICE@TANKSALOTINC.NET	Tanks-A-Lot Inc	General Manager	OOO
Mike Francis	Subcommittee Chair or Co-Chair	mfrancis@coxoil.com	Cox	Cox	OOO
Jason Rains-Love	Subcommittee Chair or Co-Chair	jrl@coxoil.com	Cox	Cox	OOO
William Walker	OOO Member Registration	bill.walker@external.total.com	TOTAL E & P USA, INC>	Senior Safety Representative	OOO
Dean Kaspar	OOO Member Registration	dean.d.kaspar@exxonmobil.com	ExxonMobil	Safety & Risk Advisor	OOO
Brad Miller	OOO Member Registration	brad.miller@anadarko.com	Anadarko Petroleum Corp	Director, Regulatory and Advocacy	OOO
Larry Tolleson	OOO Member Registration	ltolleson@renaissanceoffshore.com	Renaissance Offshore	VP Drilling and Operations	OOO
Timothy Charters	Government / Invited Speaker	tcharters@noia.org	National Ocean Industries Association	Vice President, Government Affairs	NOIA
Jennifer Medcalf	Early Non-OOO Member	Jmedcalf@theREACHgroup.com	REACH	Vice President-Business Development	NOIA
Whitney Grande	Subcommittee Chair or Co-Chair	Whitney.grande@enipetroleum.com	eni	eni	OOO
Brian Mamelli	Subcommittee Chair or Co-Chair	Brian.Mamelli@enipetroleum.com	eni	eni	OOO
Ray Arnold	Subcommittee Chair or Co-Chair	rayarnold@chevron.com	Chevron	Environmental Risk Scientist	OOO
ALEX BROUSSARD	Early Non-OOO Member	ashu_vashisht@mcoffshorepetroleum.com	MC OFFSHORE PETROLEUM, LLC	Regulatory / Operations	OOO
Charles Rougeau	OOO Member Registration	crougeau@nstaroffshore.com	Northstar Offshore Ventures	Sr. VP and Chief Operating Officer	OOO
Charles Rougeau	OOO Member Registration	crougeau@nstaroffshore.com	Northstar Offshore Ventures	Sr. VP and Chief Operating Officer	OOO
Michael Koenig	OOO Member Registration	mkoenig@renaissanceoffshore.com	Renaissance Offshore, LLC	Vice President, Land & Business Development	NOIA
Dawn Coughlin	OOO Member Registration	dcoughlin@hess.com	Hess Corporation	Sr. Advisor, Regulatory and Environmental Affairs	OOO
Roy Wells	Subcommittee Chair or Co-Chair	roy.wells@halliburton.com	Halliburton	Environmental Advisor	OOO
Haley Bates	Government / Invited Speaker	Harley.D.Bates@uscg.mil	USCG OCS National Center of Expertise	Technical Advisor; OCS/Marine Inspector	OOO
Lacy Abshire	Subcommittee Chair or Co-Chair	labshire@enven.com	EnVen	OOO	OOO
David Helminiak	Subcommittee Chair or Co-Chair	dhelminiak@enven.com	EnVen	SEMS Chair	OOO
Mike Stark	Government / Invited Speaker	mike.stark@genlp.com	Genesis Energy, L.P.	Sr. Director, Offshore Pipelines & Facilities	OOO
William Terrebonne	OOO Member Registration	william.terrebonne@shell.com	Shell	Regulatory Team Leader	OOO
Curt Johnson	OOO Member Registration	johnsonc@centerforoffshoresafety.org	Center for Offshore Safety	SEMS Audit, Accreditation and Certification	OOO
Erik Case	OOO Member Registration	erik.case@exxonmobil.com	ExxonMobil Production Company	Regulatory Specialist	OOO
Stuart Kean	OOO Member Registration	stuart.kean@bhpbilliton.com	BHP	Operations Services & Logistics Manager	OOO

Steve Eckman	OOO Member Registration	steve.eckman@anadarko.com	Anadarko Petroleum Corp	Sr. Drilling Superintendent, Offshore GOM	OOO
Miriam Garcia	Government / Invited Speaker	garciam@centerforoffshoresafety.org	Center for Offshore Safety	Executive Assistant	API
Kathi Gamiotea	OOO Member Registration	kgamiotea@arenaoffshore.com	Arena Offshore, LP	Regulatory Specialist	OOO
Steve Frantz	OOO Member Registration	SFrantz@arenaoffshore.com	Arena Offshore, LP	Construction Manager	OOO
Mike McCauley	OOO Member Registration	MMcCauley@arenaoffshore.com	Arena Offshore, LP	Operations General Manager	OOO
Jordann Bornhoft	OOO Member Registration	Jordann.m.bornhoft@exxonmobil.com	ExxonMobil	GOM Asset Engineer	OOO
Jonathan Schlicher	Early Non-OOO Member	Jonathan.Schlicher@bakerhughes.com	Baker Hughes	Operations Technical Support	OOO
Philip Emanuel	OOO Member Registration	Philip.Emanuel@mhes.com	M&H	Audit Manager/Lead Auditor	OOO
Thomas August, Jr.	OOO Member Registration	Thomas.august@chevron.com	Chevron	Land Team Lead	OOO
Thomas August, Jr.	OOO Member Registration	Thomas.august@chevron.com	Chevron	Land Team Lead	OOO
Thomas August, Jr.	OOO Member Registration	Thomas.august@chevron.com	Chevron	Land Team Lead	OOO
Garland Gaspard	OOO Member Registration	garland.gaspard@genlp.com	Genesis Energy	SVP, Operations & Engineering	OOO
Garland Gaspard	Government - Pay for Lunch	garland.gaspard@genlp.com	Genesis Energy	SVP, Operations & Engineering	OOO
Michael Fairburn	OOO Member Registration	michael.fairburn@shell.com	Shell	Shell General Manager GoM Regulatory Affairs	OOO
Stephen Wiegand	OOO Member Registration	swiegand@liskow.com	Liskow & Lewis	Attorney	OOO
John Cannon	OOO Member Registration	jfnm@chevron.com	Chevron	Environmental Specialist	OOO
Jaime Carbajal	OOO Member Registration	Jaime.Carbajal@chevron.com	Chevron	General Manager - HES Gulf of Mexico	OOO
Matthew Waters	OOO Member Registration	matthew.f.waters@exxonmobil.com	ExxonMobil	D&S IMT Manager	OOO
Birdella Sinegal	OOO Member Registration	birdella.sinegal@mineralstech.com		1960 QEH/Operation Coordinator	OOO
Steve Velzis	OOO Member Registration	Steve.Velzis@bp.com	BP	Area Marine Authority GoM, Angola and Trinidad Regions	OOO
Sandi fury	OOO Member Registration	(b) (6)	Chevron	Reg Affairs Mgr	OOO
Carol Eaton	OOO Member Registration	carole@llog.com	LLOG Exploration Offshore, L.L.C.	Regulatory Coordinator	OOO
Foster Wade	OOO Member Registration	fwad@equinor.com	Equinor	Manager, Public & Regulatory Affairs	OOO
Luiz Feijo	OOO Member Registration	lfeijo@eagle.org	ABS	Director Global Offshore	OOO
David Cain	OOO Member Registration	David.cain@lr.org	Lloyd s Register	Principal Engineer	OOO
John Shelton	OOO Member Registration	johnshelton@delmarsystems.com	Delmar Systems, Inc.	VP Technical Services	OOO
Aubin Buquet	OOO Member Registration	abuquet@petroquest.com	PetroQuest Energy	Production Manager	OOO
John Bodin	OOO Member Registration	John@delmarsystems.com	Delmar Systems	Director-Global Business Development	OOO
Kevin Dischler	OOO Member Registration	Kevin.Dischler@element.com	Element	Operarions Manager	OOO
David Broussard	OOO Member Registration	David.broussard@fwelc.com	Fieldwood Energy	Compliance Supervisor	OOO
Joseph Leimkuhler	OOO Member Registration	jml@llog.com	LLOG Exploration	VP-Drilling	OOO
Stephen Wiegand	OOO Member Registration	swiegand@liskow.com	Liskow & Lewis	Attorney	OOO
Lance Labiche	OOO Member Registration	lance.labiche@jccteam.com	J. Connor Consulting	President	OOO
Matt Harlan	OOO Member Registration	matt.harlan@jccteam.com	J. Connor Consulting	Special Projects Coordinator	OOO
Danielle Morvant	OOO Member Registration	dmorvant@safe-zone.com	SafeZone Safety Systems, LLC	VP, Business Development	OOO
Danielle Morvant	OOO Member Registration	dmorvant@safe-zone.com	SafeZone Safety Systems, LLC	VP, Business Development	OOO
Jason Sullivan	OOO Member Registration	jason.sullivan@verisglobal.com	Veris Global, LLC	Senior Vice President & Principal	OOO
Jason Sullivan	OOO Member Registration	jason.sullivan@verisglobal.com	Veris Global, LLC	Senior Vice President & Principal	OOO
Jason Sullivan	OOO Member Registration	jason.sullivan@verisglobal.com	Veris Global, LLC	Senior Vice President & Principal	OOO
Jason Sullivan	OOO Member Registration	jason.sullivan@verisglobal.com	Veris Global, LLC	Senior Vice President & Principal	OOO
Jason Sullivan	OOO Member Registration	jason.sullivan@verisglobal.com	Veris Global, LLC	Senior Vice President & Principal	OOO
Lori LeBlanc	OOO Member Registration	lori@lorileblanccllc.com	LMOGA	Director, Offshore Committee	LMOGA
Brian Boyer	OOO Member Registration	(b) (6)	BTGap, L.L.C.	Environmental Consultant	OOO
Brian Boyer	OOO Member Registration	(b) (6)	BTGap, L.L.C.	Environmental Consultant	OOO
L.T. Cooper	OOO Member Registration	ltcooper@edg.net	EDG, Inc.	Structural Engineering Manager	OOO
Bobby Cotton	OOO Member Registration	bobby.cotton@fwelc.com	Fieldwood Energy	HSE Coordinator	OOO
Alex Alvaado	Early Non-OOO Member	aalvarado@projectconsulting.com	PCS	Consultant	OOO
Frank Gallander	OOO Member Registration	fgallander@chevron.com	Chevron	Industry Interface Consultant	OOO
Dan Lawrence	Government / Invited Speaker	james.d.lawrence@uscg.mil	U.S. Coast Guard	Coast Guard Offshore Engineer	OOO
Keith Caulfield	OOO Member Registration	kcaulfield@endeavormgmt.com	Endeavor Management	Decommissioning Team Lead	OOO
Foster Wade	OOO Member Registration	fwad@equinor.com	Equinor	Manager - Public & Regulatory Affairs	OOO
Larry Forster	OOO Member Registration	Lforster@endeavormgmt.com	Endeavor Management	Project Advisor	OOO
Brady Tillman	OOO Member Registration	gbtillman@edg.net	EDG, Inc	Project Engineer	OOO
Carlyle Bourgeois	OOO Member Registration	carlyle.bourgeois@element.com	Element	BDM	OOO
Marla Begnaud	OOO Member Registration	marla.begnaud@fwelc.com	Fieldwood Energy LLC	Environmental Supervisor	OOO
Peter Neenan	OOO Member Registration	pete.neenan@otcompliance.com	Offshore Technical Compliance LLC	Business Development	OOO
Chris Woodle	OOO Member Registration	cwoodle@chevron.com	Chevron	Marine Regulatory Advisor	OOO
Phil Bernard	OOO Member Registration	philb@ctgcentral.com	Compliance Technology Group	Sales & Marketing Director	OOO

Amber Tierce	OOO Member Registration	amber.tierce@chevron.com	Chevron	Senior Advisor -- Regulatory Affairs	OOO
Tim Westerman	OOO Member Registration	twesterman@ankorenergy.com	ANKOR Energy LLC	Safety Manager	OOO
Bruce Williamson	OOO Member Registration	bwilliamson@ankorenergy.com	ANKOR Energy LLC	Production Manager	OOO
Karen Vanacor	OOO Member Registration	kvanacor@ankorenergy.com	ANKOR Energy LLC	Regulatory	OOO
Karen Vanacor	OOO Member Registration	kvanacor@ankorenergy.com	ANKOR Energy LLC	Regulatory	OOO
Karen Vanacor	OOO Member Registration	kvanacor@ankorenergy.com	ANKOR Energy LLC	Regulatory	OOO
Greg Kusinski	OOO Member Registration	grzk@chevron.com	Chevron U.S.A. Inc.	Senior Advisor, Regulatory Affairs - Technology Strategy and Acceptance	OOO
Robert Pilko	OOO Member Registration	bpilko@blade-energy.com	Blade Energy Partners	Strategic Relations Director	OOO
Laura Johnson	OOO Member Registration	laura.t.johnson@yahoo.com	ExxonMobil	US Production SSH&E Manager	OOO
Changyong Zhang	OOO Member Registration	changyong.zhang@exxonmobil.com	ExxonMobil Upstream Research Company	Engineer	OOO
Dan McKnight	OOO Member Registration	dmcknight@helisoil.com	Helis Oil & Gas Company, L.L.C.	Production Manager	OOO
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Charles Dudek	OOO Member Registration	cdudek@kosmosenergy.com	Kosmos Energy	HSE Manager	OOO
Jared Sagona	OOO Member Registration	jsagona@coxoil.com	Cox Operating	SEMS	OOO
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Shak Shamsy	OOO Member Registration	shakir@chevron.com	Chevron	DeepStar Director	OOO
Jim Floyd	OOO Member Registration	jim.floyd@chevron.com	Chevron	Environmental-Water Advisor	OOO
Joseph Gomes	OOO Member Registration	(b) (6)	DeepStar	Program Manager	OOO
Cameron Womack	OOO Member Registration	Cameron.Womack@talosenergy.com	Talos Energy	Manager - Operational HSE & SEMS	OOO
Jeff Scott	OOO Member Registration	jeffs@sempcheck.com	SEMPCheck Services	Senior VP	OOO
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Marsha Dupont	OOO Member Registration	mdupont@eeusa.com	EEUSA Inc.	NPDES Compliance Manager	OOO
Josh O'Brien	OOO Member Registration	joshua.e.obrien@shell.com	Shell	Sr. Environmental Engineer	OOO
Brian Weydert	OOO Member Registration	brianw@llog.com	LLOG	Safety Manager	OOO
Bola Adeshina	OOO Member Registration	Bola.Adeshina@williams.com	Williams	Manager EH&S, AG Environmental	OOO
Bola Adeshina	OOO Member Registration	Bola.Adeshina@williams.com	Williams	Manager EH&S, AG Environmental	OOO
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Joyce Davis	OOO Member Registration	Joyce.Davis@shell.com	SPLC	Staff Engineer	OOO
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Brandy Harrington	OOO Member Registration	harringtonb@centerforoffshoresafety.org	Center for Offshore Safety	Associate	OOO
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BRYAN MACK	OOO Member Registration	BRYAN.MACK@WOODPLC.COM	WOOD	SEMS/COMPLIANCE MANAGER	OOO
JAN ROGERS	OOO Member Registration	JAN.ROGERS@WOODPLC.COM	WOOD.	HSSEA MANAGER	OOO
JAN ROGERS	OOO Member Registration	JAN.ROGERS@WOODPLC.COM	WOOD.	HSSEA MANAGER	OOO
JAN ROGERS	OOO Member Registration	JAN.ROGERS@WOODPLC.COM	WOOD.	HSSEA MANAGER	OOO
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Mick Fincham	Early Non-OOO Member	(b) (6)	Talos	Marine Assurance	OOO
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John Spath	Government / Invited Speaker	John.Spath@talosenergy.com	Talos Energy	SVP Production Operations	OOO
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Bekki Winfree	OOO Member Registration	Bekw@equinor.com	Equinor	Sr. Regulatory Advisor	OOO
Chris Woodle	OOO Member Registration	cwoodle@chevron.com	Chevron	Marine Regulatory Advisor	OOO
Eric Roan	OOO Member Registration	eroan1@me.com	Offshore Compliance Solutions LLC	President	OOO
Eric Roan	Early Non-OOO Member	eroan1@me.com	Offshore Compliance Solutions LLC	President	OOO
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Scherie Douglas	OOO Member Registration	(b) (6)	Energy XXI	Regulatory Manager	OOO
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Cindy Kunkel	OOO Member Registration	cindy_kunkel@murphyoilcorp.com	Murphy	Sr. Specialist - Regulatory	OOO
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Harley Bates	Government / Invited Speaker	Harley.D.Bates@uscg.mil	USCG Outer Continental Shelf National Center of Expertise	Technical Advisor, Marine Inspector	OOO
Daniel Hamilton	OOO Member Registration	daniel.hamilton@williams.com	Williams	SEMS Coordinator	OOO
Lincoln Stroh	OOO Member Registration	lincoln.stroh@jcccteam.com	JCC	VP SEMS	OOO
Evan Zimmerman	OOO Member Registration	evan@offshoreoperators.com	OOO	Executive Director	OOO

Conversation Contents

Automatic reply: [EXTERNAL] RE: BAST Production Equipment List-.docx

Holly Hopkins <hopkinsh@api.org>

From: Holly Hopkins <hopkinsh@api.org>
Sent: Sun Jan 27 2019 19:02:54 GMT-0700 (MST)
To: "Beard, Preston" <preston.beard@bsee.gov>
Subject: Automatic reply: [EXTERNAL] RE: BAST Production Equipment List-.docx

I am currently out of the office on business travel until Monday, January 28, 2019. I will respond to your message as soon as possible. Thanks and have a great day!

Conversation Contents

[EXTERNAL] RE: BAST Production Equipment List-.docx

Holly Hopkins <hopkinsh@api.org>

From: Holly Hopkins <hopkinsh@api.org>
Sent: Thu Jan 24 2019 07:32:54 GMT-0700 (MST)
To: Scott Angelle <scott.angelle@bsee.gov>,
"Evan@offshoreoperators.com" <Evan@offshoreoperators.com>
CC: "Beard, Preston" <preston.beard@bsee.gov>
Subject: [EXTERNAL] RE: BAST Production Equipment List-.docx

Scott, Hope you had a great holiday and are surviving the government shutdown. Industry is working on our review of the BAST production list and hope to have our comments by the requested February 15th date. Assuming the government has resumed full operations by that time we are prepared to meet in New Orleans on February 14 or 15 or Washington, DC on February 21 or at a later date that is convenient for you. Please let us know. Thanks, Holly and Evan -----Original Message----- From: Scott Angelle <scott.angelle@bsee.gov> Sent: Wednesday, December 5, 2018 5:37 AM To: Evan@offshoreoperators.com; Holly Hopkins <hopkinsh@api.org> Subject: BAST Production Equipment List-.docx Good morning. Thank you for providing your work product on your review of the drilling equipment you concluded are subject to BAST. BSEE subject matter experts have been assigned to review and respond. I am attaching a document that these same subject matter experts have prepared relative to production equipment they believe could be subject to BAST. BSEE is committed to continuing its recent efforts to elevate solutions to BAST.

Scott Angelle <scott.angelle@bsee.gov>

From: Scott Angelle <scott.angelle@bsee.gov>
Sent: Fri Jan 25 2019 17:02:41 GMT-0700 (MST)
To: Holly Hopkins <hopkinsh@api.org>
"Evan@offshoreoperators.com" <Evan@offshoreoperators.com>,
"Beard, Preston" <preston.beard@bsee.gov>
Subject: Re: [EXTERNAL] RE: BAST Production Equipment List-.docx

Thank you very much. Preston please schedule for February 21 in dc. Holly and Evan thanks for your interest in a safe ocs Sent from my iPhone > On Jan 24, 2019, at 9:32 AM, Holly Hopkins <hopkinsh@api.org> wrote: > > Scott, > > Hope you had a great holiday and are surviving the government shutdown. Industry is working on our review of the BAST production list and hope to have our comments by the requested February 15th date. Assuming the government has resumed full operations by that time we are prepared to meet in New Orleans on February 14 or 15 or Washington, DC on February 21 or at a later date that is convenient for you. Please let us know. > > Thanks, > Holly and Evan > > -----Original Message----- > From: Scott Angelle <scott.angelle@bsee.gov> > Sent: Wednesday, December 5, 2018 5:37 AM > To: Evan@offshoreoperators.com; Holly Hopkins <hopkinsh@api.org> > Subject: BAST Production Equipment List-.docx > > Good morning. Thank you for providing your work product on your >

review of the drilling equipment you concluded are subject to BAST. > BSEE subject matter experts have been assigned to review and respond. > > I am attaching a document that these same subject matter experts have prepared relative to production equipment they believe could be subject to BAST. > > BSEE is committed to continuing its recent efforts to elevate solutions to BAST.

"Beard, Preston" <preston.beard@bsee.gov>

From: "Beard, Preston" <preston.beard@bsee.gov>
Sent: Sun Jan 27 2019 19:02:05 GMT-0700 (MST)
To: Scott Angelle <scott.angelle@bsee.gov>
CC: Holly Hopkins <hopkinsh@api.org>, "Evan@offshoreoperators.com" <Evan@offshoreoperators.com>
Subject: Re: [EXTERNAL] RE: BAST Production Equipment List-.docx

Set from 1-2 on the 21.

On Fri, Jan 25, 2019 at 7:02 PM Scott Angelle <scott.angelle@bsee.gov> wrote:

Thank you very much. Preston please schedule for February 21 in dc.
Holly and Evan thanks for your interest in a safe ocs

Sent from my iPhone

> On Jan 24, 2019, at 9:32 AM, Holly Hopkins <hopkinsh@api.org> wrote:

>

> Scott,

>

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>

> Thanks,

> Holly and Evan

>

> -----Original Message-----

> From: Scott Angelle <scott.angelle@bsee.gov>

> Sent: Wednesday, December 5, 2018 5:37 AM

> To: Evan@offshoreoperators.com; Holly Hopkins <hopkinsh@api.org>

> Subject: BAST Production Equipment List-.docx

>

> Good morning. Thank you for providing your work product on your

> review of the drilling equipment you concluded are subject to BAST.

> BSEE subject matter experts have been assigned to review and respond.

>

> I am attaching a document that these same subject matter experts have prepared relative to production equipment they believe could be subject to BAST.

>

> BSEE is committed to continuing its recent efforts to elevate solutions to BAST.

Preston Beard
Advisor, Office of the Director
Bureau of Safety and Environmental Enforcement
(202) 208-3976 (o)
(571) 585-7001 (c)
preston.beard@bsee.gov



Holly Hopkins <hopkinsh@api.org>

From: Holly Hopkins <hopkinsh@api.org>
Sent: Sun Jan 27 2019 19:21:32 GMT-0700 (MST)
To: "Beard, Preston" <preston.beard@bsee.gov>, Scott Angelle <scott.angelle@bsee.gov>
CC: "Evan@offshoreoperators.com" <Evan@offshoreoperators.com>
Subject: Re: [EXTERNAL] RE: BAST Production Equipment List-.docx

Thanks

----- Original message -----

From: "Beard, Preston" <preston.beard@bsee.gov>
Date: 1/27/19 9:02 PM (GMT-05:00)
To: Scott Angelle <scott.angelle@bsee.gov>
Cc: Holly Hopkins <hopkinsh@api.org>, Evan@offshoreoperators.com
Subject: Re: [EXTERNAL] RE: BAST Production Equipment List-.docx

Set from 1-2 on the 21.

On Fri, Jan 25, 2019 at 7:02 PM Scott Angelle <scott.angelle@bsee.gov> wrote:

Thank you very much. Preston please schedule for February 21 in dc.
Holly and Evan thanks for your interest in a safe ocs

Sent from my iPhone

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>

> Scott,

>

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> Holly and Evan

>

> -----Original Message-----

> From: Scott Angelle <scott.angelle@bsee.gov>
> Sent: Wednesday, December 5, 2018 5:37 AM
> To: Evan@offshoreoperators.com; Holly Hopkins <hopkinsh@api.org>
> Subject: BAST Production Equipment List-.docx
>
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> I am attaching a document that these same subject matter experts have prepared relative to
production equipment they believe could be subject to BAST.
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> BSEE is committed to continuing its recent efforts to elevate solutions to BAST.

--

Preston Beard
Advisor, Office of the Director
Bureau of Safety and Environmental Enforcement
(202) 208-3976 (o)
(571) 585-7001 (c)
preston.beard@bsee.gov



Evan Zimmerman <evan@zimmerman-co.com>

From: Evan Zimmerman <evan@zimmerman-co.com>
Sent: Sun Jan 27 2019 22:39:23 GMT-0700 (MST)
To: "Beard, Preston" <preston.beard@bsee.gov>
Subject: Re: [EXTERNAL] RE: BAST Production Equipment List-.docx

Thanks, Preston.

Cheers,

Evan H. Zimmerman
Executive Director
Offshore Operators Committee
Evan@offshoreoperators.com

On Jan 27, 2019, at 8:02 PM, Beard, Preston <preston.beard@bsee.gov> wrote:

Set from 1-2 on the 21.

On Fri, Jan 25, 2019 at 7:02 PM Scott Angelle <scott.angelle@bsee.gov> wrote:
Thank you very much. Preston please schedule for February 21 in dc.
Holly and Evan thanks for your interest in a safe ocs

Sent from my iPhone

> On Jan 24, 2019, at 9:32 AM, Holly Hopkins <hopkinsh@api.org> wrote:
>
> Scott,
>
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Industry is working on our review of the BAST production list and hope to have our
comments by the requested February 15th date. Assuming the government has
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February 14 or 15 or Washington, DC on February 21 or at a later date that is
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> -----Original Message-----
> From: Scott Angelle <scott.angelle@bsee.gov>
> Sent: Wednesday, December 5, 2018 5:37 AM
> To: Evan@offshoreoperators.com; Holly Hopkins <hopkinsh@api.org>
> Subject: BAST Production Equipment List-.docx
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> Good morning. Thank you for providing your work product on your
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prepared relative to production equipment they believe could be subject to BAST.
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> BSEE is committed to continuing its recent efforts to elevate solutions to BAST.

--

Preston Beard
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preston.beard@bsee.gov



Conversation Contents

Re: [EXTERNAL] NOIA Speaking Opportunity

Attachments:

/6. Re: [EXTERNAL] NOIA Speaking Opportunity/1.1 image001.png

"Angelico, Eileen" <eileen.angelico@bsee.gov>

From: "Angelico, Eileen" <eileen.angelico@bsee.gov>
Sent: Tue Jan 29 2019 15:05:29 GMT-0700 (MST)
To: Joe Leimkuhler <jml@llog.com>
CC: "Scott Angelle (scott.angelle@bsee.gov)" <scott.angelle@bsee.gov>, Randall Luthi <rluthi@noia.org>, "Beard, Preston" <preston.beard@bsee.gov>, "Mcbrady, Monica" <monica.mcbrady@bsee.gov>
Subject: Re: [EXTERNAL] NOIA Speaking Opportunity
Attachments: image001.png

Thanks Joe for your and NOIA's interest in BSEE.

We are currently reviewing the Director's Spring 2019 schedule. I will let you know something as soon as I can. In order for us to give the opportunity full consideration, can you please provide the following information:

Event Title and Organizer:

Date of Event:

Location:

Topic:

Length and Format of Remarks:

Open or Closed Press:

Nature of Press and Expected Coverage (e.g. trade press, local reporters, national media, etc.):

Audience: (expected count and representatives of ?):

Point of Contact for Event:

On Tue, Jan 29, 2019 at 4:21 PM Joe Leimkuhler <jml@llog.com> wrote:

Scott,

I hope all is well with you and BSEE and any further shutdowns can be avoided.

I have taken over as the Chairman of the HSE committee in NOIA. <https://www.noia.org/about/>

Our annual Washington spring meeting is coming up and I would like to know if you can speak and provide an update on what is going on in the "S" in BSEE – Safety. What I have noticed at prior NOIA meetings is the higher percentage of upper level operator management that attends the NOIA bi-annual meetings. I am actually one of the lower folks in the crowd.

The meeting is at the Ritz Carlton Hotel in Washington DC on April 10th and 11th . Right now we have a slot at about 2:00 pm on Wednesday April 10th and one at 10:50 am on Thursday April 11. Both are very good slots, and you don't have to travel for this event!

Areas that I think would be of interest to myself as well as the NOIA crowd are:

1. Safety Trends – any insights that upper level operator management needs to be aware of both positive as well as concerning.
2. BSEE Safety Initiative status – particularly Safe OCS. LLOG's first meeting on data input into Safe OCS is set with the BLS folks on Monday so we are gearing up to input data. Any info on the number of operators that are and will be participating in the program going forward? I have been working with Demetria Collins on a Safe OCS module that would pilot the FAA/Airline model protocol, I feel we still have some work to do before re-engaging with BSEE on this potential initiative – however, any positive comments you could make in that direction would be appreciated.
3. Any other Initiatives of Note:
 - a. Rulemaking - If the well control final rule is issued, perhaps you can comment on that rulemaking as well. If it is not released by April we fully understand that any discussion on that topic is internal to BSEE until released.
 - b. BAST
 - c. SEMS

In my opinion there has been too much press focused on regulatory changes where any change is almost automatically deemed a compromise to safety. Based on my review of recent BSEE actions and the proposed final rule on well control – there are no actual concessions to safety, but rather the changes represent a clarification of existing rules or an actual change that will improve safety. Thus, I feel a presentation/talk focused on the "S" in BSEE is very timely.

Let me know if you have any questions. I hope you can join us.

Joseph Leimkuhler
Vice President – Drilling, LLOG Exploration L.L.C.

Description: LLOG_RGB-
150dpi Transparent small

1001 Ochsner Blvd., Suite 100
Covington, Louisiana 70433
(985) 801-4300

Disclaimer: This message (including any attachments) is intended only for the confidential use of the intended recipient(s). If you are not the intended recipient(s) of the message, you are hereby notified that you should delete this message and that any review, dissemination, distribution or copying by you of this message is strictly prohibited.

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Conversation Contents

BAST Meeting

preston.beard@bsee.gov

From: preston.beard@bsee.gov
Sent: Thu Feb 07 2019 06:03:20 GMT-0700 (MST)
To: preston.beard@bsee.gov, hopkinsh@api.org, evan@offshoreoperators.com
Subject: BAST Meeting

Good morning, unfortunately Director Angelle will not be in Washington DC during this week and we will need to reschedule this morning. I apologize for the inconvenience and will get back to you shortly.

BAST Meeting

When Thu Feb 21, 2019 1pm – 2pm Eastern Time - New York

Video call https://hangouts.google.com/hangouts/_/doi.gov/hopkinsh-scott

Who

- scott.angelle@bsee.gov - organizer
- preston.beard@bsee.gov - creator
- hopkinsh@api.org
- oiea@ios.doi.gov

Holly Hopkins <hopkinsh@api.org>

From: Holly Hopkins <hopkinsh@api.org>
Sent: Thu Feb 07 2019 07:06:22 GMT-0700 (MST)
To: "preston.beard@bsee.gov" <preston.beard@bsee.gov>, "evan@offshoreoperators.com" <evan@offshoreoperators.com>
Subject: [EXTERNAL] Re: BAST Meeting

Ok thanks. Let us know

----- Original message -----

From: preston.beard@bsee.gov
Date: 2/7/19 8:03 AM (GMT-05:00)
To: preston.beard@bsee.gov, Holly Hopkins <hopkinsh@api.org>, evan@offshoreoperators.com
Subject: BAST Meeting

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and we will need to reschedule this morning. I apologize for the inconvenience and will get back to you shortly.

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Video call https://hangouts.google.com/hangouts/_/doi.gov/hopkinsh-scott

Who

- scott.angelle@bsee.gov - organizer
- preston.beard@bsee.gov - creator
- hopkinsh@api.org
- oiea@ios.doi.gov

Conversation Contents

[EXTERNAL] 2019 Meeting

Lori LeBlanc <lori@lorileblancllc.com>

From: Lori LeBlanc <lori@lorileblancllc.com>
Sent: Tue Dec 11 2018 13:03:15 GMT-0700 (MST)
To: <eileen.angelico@bsee.gov>
CC: <preston.beard@bsee.gov>
Subject: [EXTERNAL] 2019 Meeting

Hi Eileen,

I hope you are doing well. I am interested in scheduling a meeting with Director Angelle and some of our LMOGA members in February 2019 in Houston. The purpose of the meeting would be to visit on some of the high level offshore regulatory and policy issues. We do not have a specific date in mind and can be flexible to work within his schedule. Please let me know if Director Angelle can accommodate a February meeting.

Feel free to contact me at 985.209.7932 if you have any questions.

Thank you,

Lori

Lori LeBlanc
Director, Offshore Committee
Louisiana Mid-Continent Oil & Gas Association
985.209.7392
lori@lorileblancllc.com

"Angelico, Eileen" <eileen.angelico@bsee.gov>

From: "Angelico, Eileen" <eileen.angelico@bsee.gov>
Sent: Tue Dec 11 2018 13:12:28 GMT-0700 (MST)
To: Lori LeBlanc <lori@lorileblancllc.com>
CC: "Beard, Preston" <preston.beard@bsee.gov>
Subject: Re: [EXTERNAL] 2019 Meeting

Thanks Lori for your and LMOGA's interest in the work of BSEE.

I am currently working with the Director's schedule for the first quarter of 2019, and will see what we can schedule.

Thanks,

Eileen

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985.209.7392
lori@lorileblancllc.com

Lori LeBlanc <lori@lorileblancllc.com>

From: Lori LeBlanc <lori@lorileblancllc.com>
Sent: Tue Dec 11 2018 14:04:35 GMT-0700 (MST)
To: "Angelico, Eileen" <eileen.angelico@bsee.gov>
CC: "Beard, Preston" <preston.beard@bsee.gov>
Subject: Re: [EXTERNAL] 2019 Meeting

Thank you Eileen.

Lori

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lori@lorileblancllc.com

"lori@lorileblancllc.com" <lori@lorileblancllc.com>

From: "lori@lorileblancllc.com" <lori@lorileblancllc.com>
Sent: Wed Dec 12 2018 11:38:01 GMT-0700 (MST)
To: "Angelico, Eileen" <eileen.angelico@bsee.gov>
CC: "Beard, Preston" <preston.beard@bsee.gov>
Subject: Re: [EXTERNAL] 2019 Meeting

Also, I will be in DC Jan 29-31 if he has some time available to visit during that timeframe.
Thanks again,

Lori

On Dec 11, 2018, at 3:04 PM, Lori LeBlanc <lori@lorileblancllc.com> wrote:

Thank you Eileen.

Lori

On December 11, 2018 at 3:12 PM "Angelico, Eileen"
<eileen.angelico@bsee.gov> wrote:

Thanks Lori for your and LMOGA's interest in the work of BSEE.

I am currently working with the Director's schedule for the first quarter of 2019, and will see what we can schedule.

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lori@lorileblancllc.com

Lori LeBlanc <lori@lorileblancllc.com>

From: Lori LeBlanc <lori@lorileblancllc.com>
Sent: Thu Jan 10 2019 09:03:57 GMT-0700 (MST)
To: "Angelico, Eileen" <eileen.angelico@bsee.gov>
CC: "Beard, Preston" <preston.beard@bsee.gov>
Subject: Re: [EXTERNAL] 2019 Meeting

Hi Eileen - I hope you are doing well and Happy New Year to you. With the Government shut down I'm not sure where any of this stands but I just want to check in with you to determine if you were able to work out any scheduling on this meeting? Let me know if there is anything I can do on my end.

Thank you,

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I am currently working with the Director's schedule for the first quarter of 2019, and will see what we can schedule.

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"Angelico, Eileen" <eileen.angelico@bsee.gov>

From: "Angelico, Eileen" <eileen.angelico@bsee.gov>
Sent: Wed Jan 23 2019 08:19:14 GMT-0700 (MST)
To: Lori LeBlanc <lori@lorileblancllc.com>
CC: "Beard, Preston" <preston.beard@bsee.gov>
Subject: Re: [EXTERNAL] 2019 Meeting

Good morning Lori,

I apologize for not getting back to you sooner.

Under the current shutdown period, we have been cancelling external meetings and not scheduling any future ones.

At this time, there is no scheduled travel to the Houston area. We will keep your request for consideration when the shutdown ends.

Please let me know if I can be of any further assistance.

Sincerely,

Eileen

Eileen P. Angelico, APR
Chief, Office of Public Affairs
Bureau of Safety and Environmental Enforcement
(202) 208-7746 office
(504) 654-7840 mobile

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Lori LeBlanc <lori@lorileblancllc.com>

From: Lori LeBlanc <lori@lorileblancllc.com>
Sent: Thu Jan 24 2019 11:20:24 GMT-0700 (MST)
To: "Angelico, Eileen" <eileen.angelico@bsee.gov>
CC: "Beard, Preston" <preston.beard@bsee.gov>
Subject: Re: [EXTERNAL] 2019 Meeting

Eileen,

No worries... I understand under these circumstances. Thank you for taking the time to provide an update. We will be in touch as soon as the shutdown is over.

Thank you,

Lori

On January 23, 2019 at 10:19 AM "Angelico, Eileen" <eileen.angelico@bsee.gov> wrote:

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Lori LeBlanc <lori@lorileblancllc.com>

From: Lori LeBlanc <lori@lorileblancllc.com>
Sent: Thu Feb 07 2019 12:34:32 GMT-0700 (MST)
To: "Angelico, Eileen" <eileen.angelico@bsee.gov>
CC: "Beard, Preston" <preston.beard@bsee.gov>
Subject: Re: [EXTERNAL] 2019 Meeting

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"Angelico, Eileen" <eileen.angelico@bsee.gov>

From: "Angelico, Eileen" <eileen.angelico@bsee.gov>
Sent: Thu Feb 07 2019 12:44:04 GMT-0700 (MST)
To: Lori LeBlanc <lori@lorileblancllc.com>
CC: "Beard, Preston" <preston.beard@bsee.gov>
Subject: Re: [EXTERNAL] 2019 Meeting

Lori,

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Eileen

Eileen P. Angelico, APR
Chief, Office of Public Affairs
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(202) 208-7746 office
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lori@lorileblancllc.com

Lori LeBlanc <lori@lorileblancllc.com>

From: Lori LeBlanc <lori@lorileblancllc.com>
Sent: Thu Feb 07 2019 12:47:11 GMT-0700 (MST)
To: "Angelico, Eileen" <eileen.angelico@bsee.gov>
CC: "Beard, Preston" <preston.beard@bsee.gov>
Subject: Re: [EXTERNAL] 2019 Meeting

Yes, that time works for me. You can reach me on my cell at (b) (6).

Thank you,

Lori

On February 7, 2019 at 2:44 PM "Angelico, Eileen" <eileen.angelico@bsee.gov> wrote:

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Lori LeBlanc <lori@lorileblancllc.com>

From: Lori LeBlanc <lori@lorileblancllc.com>
Sent: Fri Feb 08 2019 08:06:02 GMT-0700 (MST)
To: "Angelico, Eileen" <eileen.angelico@bsee.gov>
CC: "Beard, Preston" <preston.beard@bsee.gov>
Subject: Re: [EXTERNAL] 2019 Meeting

Hey Eileen - Let me know if you're still good to talk this morning?

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Eileen P. Angelico, APR
Chief, Office of Public Affairs
Bureau of Safety and Environmental Enforcement
(202) 208-7746 office
(504) 654-7840 mobile

On Thu, Feb 7, 2019 at 2:34 PM Lori LeBlanc <lori@lorileblancllc.com> wrote:

Hi Eileen,

Hope you are doing well. I'm just circling back with you regarding this possible meeting with Director Angelle. I realize that everything has been pushed back due to the shutdown. Let me know when you might have a few minutes to discuss briefly by phone.

Thank you again,

Lori

On January 23, 2019 at 10:19 AM "Angelico, Eileen" <eileen.angelico@bsee.gov> wrote:

Good morning Lori,

I apologize for not getting back to you sooner.

Under the current shutdown period, we have been cancelling external meetings and not scheduling any future ones.

At this time, there is no scheduled travel to the Houston area. We will keep your request for consideration when the shutdown ends.

Please let me know if I can be of any further assistance.

Sincerely,

Eileen

Eileen P. Angelico, APR
Chief, Office of Public Affairs
Bureau of Safety and Environmental Enforcement
(202) 208-7746 office
(504) 654-7840 mobile

On Thu, Jan 10, 2019 at 11:04 AM Lori LeBlanc <lori@lorileblancllc.com> wrote:

Hi Eileen - I hope you are doing well and Happy New Year to you. With the Government shut down I'm not sure where any of this stands but I just want to check in with you to determine if you were able to work out any scheduling on this meeting? Let me know if there is anything I can do on my end.

Thank you,

Lori

On December 11, 2018 at 3:12 PM
"Angelico, Eileen" <eileen.angelico@bsee.gov> wrote:

Thanks Lori for your and LMOGA's interest in the work of BSEE.

I am currently working with the Director's schedule for the first quarter of 2019, and will see what we can schedule.

Thanks,

Eileen

On Tue, Dec 11, 2018 at 3:03 PM Lori LeBlanc <lori@lorileblancllc.com> wrote:

Hi Eileen,

I hope you are doing well. I am interested in scheduling a meeting with Director Angelle and some of our LMOGA members in February 2019 in Houston. The purpose of the meeting would be to visit on some of the high level offshore regulatory and policy issues. We do not have a

specific date in mind and
can be flexible to work
within his schedule. Please
let me know if Director
Angelle can accommodate
a February meeting.

Feel free to contact me at
985.209.7932 if you have
any questions.

Thank you,

Lori

Lori LeBlanc
Director, Offshore
Committee
Louisiana Mid-Continent Oil
& Gas Association
985.209.7392
lori@lorileblancllc.com

Conversation Contents

[EXTERNAL] Meeting with the Director

Holly Hopkins <hopkinsh@api.org>

From: Holly Hopkins <hopkinsh@api.org>
Sent: Fri Feb 08 2019 09:44:55 GMT-0700 (MST)
To: Preston Beard <preston.beard@bsee.gov>
CC: Andy Radford <Radforda@api.org>, Carrie Domnitch <domnitchc@api.org>
Subject: [EXTERNAL] Meeting with the Director

Preston,

API would like to brief Director Angelle on our GOM Policy Initiatives report. We'd like him to come to API if possible. Available times are (in order of preference):

1. Wednesday, 2/13 - Morning anytime, but finish by Noon
2. Monday, 2/11 – Afternoon, end by [3:30](#)
3. Thursday, 2/14 – [11:00 am](#)
4. Thursday, 2/14 – [2:30](#) or later (last resort)

If not available next week, then Wednesday, 2/20.

Thanks,

Holly

Preston Beard <preston.beard@bsee.gov>

From: Preston Beard <preston.beard@bsee.gov>
Sent: Sun Feb 10 2019 09:24:07 GMT-0700 (MST)
To: Holly Hopkins <hopkinsh@api.org>
Subject: Re: [EXTERNAL] Meeting with the Director

Would you forward any read aheads?

-Preston
571-585-7001

On Feb 8, 2019, at 11:44 AM, Holly Hopkins <hopkinsh@api.org> wrote:

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API would like to brief Director Angelle on our GOM Policy Initiatives report. We'd like him to come to API if possible. Available times are (in order of preference):

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If not available next week, then Wednesday, 2/20.

Thanks,

Holly

Conversation Contents

RE: [EXTERNAL] NOIA Speaking Opportunity - requested Info

Attachments:

/2. RE: [EXTERNAL] NOIA Speaking Opportunity - requested Info/1.1 image001.png
/2. RE: [EXTERNAL] NOIA Speaking Opportunity - requested Info/2.1 image001.png
/2. RE: [EXTERNAL] NOIA Speaking Opportunity - requested Info/3.1 image001.png
/2. RE: [EXTERNAL] NOIA Speaking Opportunity - requested Info/4.1 image001.png
/2. RE: [EXTERNAL] NOIA Speaking Opportunity - requested Info/6.1 image001.png

Joe Leimkuhler <jml@llog.com>

From: Joe Leimkuhler <jml@llog.com>
Sent: Tue Jan 29 2019 15:35:36 GMT-0700 (MST)
To: "Angelico, Eileen" <eileen.angelico@bsee.gov>
CC: "Scott Angelle (scott.angelle@bsee.gov)" <scott.angelle@bsee.gov>, Randall Luthi <rluthi@noia.org>, "Beard, Preston" <preston.beard@bsee.gov>, "Mcbrady, Monica" <monica.mcbrady@bsee.gov>
Subject: RE: [EXTERNAL] NOIA Speaking Opportunity - requested Info
Attachments: image001.png

Sure thing, see below. Let me know if you need anything else

From: Angelico, Eileen [mailto:eileen.angelico@bsee.gov]
Sent: Tuesday, January 29, 2019 4:05 PM
To: Joe Leimkuhler
Cc: Scott Angelle (scott.angelle@bsee.gov); Randall Luthi; Beard, Preston; Mcbrady, Monica
Subject: Re: [EXTERNAL] NOIA Speaking Opportunity

Thanks Joe for your and NOIA's interest in BSEE.

We are currently reviewing the Director's Spring 2019 schedule. I will let you know something as soon as I can. In order for us to give the opportunity full consideration, can you please provide the following information:

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Date of Event: April 10th and April 11th 2019 – Time slots are: 2:00 pm on Wednesday April 10th and one at 10:50 am on Thursday April 11, 2019

Location: The Ritz-Carlton Hotel, 1150 22nd St NW, Washington, DC 20037

Topic: Suggested: Safety Update in the US Outer Continental Shelf: Trends and Information

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Operations cover Oil and Gas as well as Wind

Point of Contact for Event:

Joe Leimkuhler – LLOG Exploration (NOIA HSE Committee Chair) JML@LLOG.com (b) (6) (Cell),
Washington DC Local Contact – Randal Luthi, President, NOIA rluthi@noia.org

On Tue, Jan 29, 2019 at 4:21 PM Joe Leimkuhler <jml@llog.com> wrote:

Scott,

I hope all is well with you and BSEE and any further shutdowns can be avoided.

I have taken over as the Chairman of the HSE committee in NOIA. <https://www.noia.org/about/>

Our annual Washington spring meeting is coming up and I would like to know if you can speak and provide an update on what is going on in the “S” in BSEE – Safety. What I have noticed at prior NOIA meetings is the higher percentage of upper level operator management that attends the NOIA bi-annual meetings. I am actually one of the lower folks in the crowd.

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Let me know if you have any questions. I hope you can join us.

Joseph Leimkuhler
Vice President – Drilling, LLOG Exploration L.L.C.

Description: LLOG_RGB-
150dpi Transparent small

1001 Ochsner Blvd., Suite 100
Covington, Louisiana 70433
(985) 801-4300

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"Beard, Preston" <preston.beard@bsee.gov>

From: "Beard, Preston" <preston.beard@bsee.gov>
Sent: Mon Feb 04 2019 07:23:47 GMT-0700 (MST)
To: Casey Hammond <casey_hammond@ios.doi.gov>
Subject: Fwd: [EXTERNAL] NOIA Speaking Opportunity - requested Info
Attachments: image001.png

Per your request. See below.

----- Forwarded message -----

From: **Joe Leimkuhler** <jml@llog.com>
Date: Tue, Jan 29, 2019 at 5:35 PM
Subject: RE: [EXTERNAL] NOIA Speaking Opportunity - requested Info
To: Angelico, Eileen <eileen.angelico@bsee.gov>
Cc: Scott Angelle (scott.angelle@bsee.gov) <scott.angelle@bsee.gov>, Randall Luthi <rluthi@noia.org>, Beard, Preston <preston.beard@bsee.gov>, Mcbrady, Monica <monica.mcbrady@bsee.gov>

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Preston Beard
Advisor, Office of the Director
Bureau of Safety and Environmental Enforcement
(202) 208-3976 (o)
(571) 585-7001 (c)
preston.beard@bsee.gov



"Beard, Preston" <preston.beard@bsee.gov>

From: "Beard, Preston" <preston.beard@bsee.gov>
Sent: Mon Feb 04 2019 10:38:57 GMT-0700 (MST)
To: OIEA OS <oiea@ios.doi.gov>
Subject: Fwd: [EXTERNAL] NOIA Speaking Opportunity - requested Info
Attachments: image001.png

FYI

----- Forwarded message -----

From: Joe Leimkuhler <jml@llog.com>
Date: Tue, Jan 29, 2019 at 5:35 PM
Subject: RE: [EXTERNAL] NOIA Speaking Opportunity - requested Info
To: Angelico, Eileen <eileen.angelico@bsee.gov>
Cc: Scott Angelle (<scott.angelle@bsee.gov> <scott.angelle@bsee.gov>), Randall Luthi <rluthi@noia.org>, Beard, Preston <preston.beard@bsee.gov>, Mcbrady, Monica <monica.mcbrady@bsee.gov>

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From: "Angelico, Eileen" <eileen.angelico@bsee.gov>
Sent: Tue Feb 05 2019 08:24:49 GMT-0700 (MST)
To: Joe Leimkuhler <jml@llog.com>
"Scott Angelle (scott.angelle@bsee.gov)"
<scott.angelle@bsee.gov>, Randall Luthi <rluthi@noia.org>,
CC: "Beard, Preston" <preston.beard@bsee.gov>, "Mcbrady, Monica"
<monica.mcbrady@bsee.gov>, Vince Burke
<vincent.burke@bsee.gov>
Subject: Re: [EXTERNAL] NOIA Speaking Opportunity - requested Info
Attachments: image001.png

Good morning Joe,

We have been reviewing the Director's schedule for April 2019. Of the two times provided in NOIA's invitation to speak, the Thursday, April 11th, 10:50 am time slot looks to be the best.

Please let me know if this works for you.

Thanks for sending the logistical information for the meeting. I have added Vince Burke, the Director's speechwriter, to this email. Vince will be in touch as we get closer to the meeting.

Looking forward to a productive meeting.

Sincerely,

Eileen

Eileen P. Angelico, APR
Chief, Office of Public Affairs
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Scott Angelle <scott.angelle@bsee.gov>

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Sent: Wed Feb 13 2019 05:22:17 GMT-0700 (MST)
To: Joe Leimkuhler <jml@llog.com>
CC: "Angelico, Eileen" <eileen.angelico@bsee.gov>, Randall Luthi <rluthi@noia.org>, "Beard, Preston" <preston.beard@bsee.gov>, "Mcbrady, Monica" <monica.mcbrady@bsee.gov>
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<image001.png>
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Covington, Louisiana 70433
(985) 801-4300

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To: Scott Angelle <scott.angelle@bsee.gov>
CC: "Angelico, Eileen" <eileen.angelico@bsee.gov>, Randall Luthi <rluthi@noia.org>, "Beard, Preston" <preston.beard@bsee.gov>, "Mcbrady, Monica" <monica.mcbrady@bsee.gov>
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Attachments: image001.png

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Description: LLOG_RGB-
150dpi Transparent small

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CC: "Angelico, Eileen" <eileen.angelico@bsee.gov>, Randall Luthi <rluthi@noia.org>, "Beard, Preston" <preston.beard@bsee.gov>, "Mcbrady, Monica" <monica.mcbrady@bsee.gov>
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Nature of Press and Expected Coverage (e.g. trade press, local reporters, national media, etc.): None

Audience: (expected count and representatives of ?): 100-150 – Audience consists of upper management of Operators and Major Service Companies that work in the OCS – predominately the Gulf of Mexico. Operations cover Oil and Gas as well as Wind

Point of Contact for Event:

Joe Leimkuhler – LLOG Exploration (NOIA HSE Committee Chair) JML@LLOG.com (b) (6)

(Cell),

Washington DC Local Contact – Randal Luthi, President, NOIA rluthi@noia.org

On Tue, Jan 29, 2019 at 4:21 PM Joe Leimkuhler <jml@llog.com> wrote:

Scott,

I hope all is well with you and BSEE and any further shutdowns can be avoided.

I have taken over as the Chairman of the HSE committee in NOIA. <https://www.noia.org/about/>

Our annual Washington spring meeting is coming up and I would like to know if you can speak and provide an update on what is going on in the “S” in BSEE – Safety. What I have noticed at prior NOIA meetings is the higher percentage of upper level operator management that attends the NOIA bi-annual meetings. I am actually one of the lower folks in the crowd.

The meeting is at the Ritz Carlton Hotel in Washington DC on April 10th and 11th . Right now we have a slot at about 2:00 pm on Wednesday April 10th and one at 10:50 am on Thursday April 11. Both are very good slots, and you don't have to travel for this event!

Areas that I think would be of interest to myself as well as the NOIA crowd are:

1. Safety Trends – any insights that upper level operator management needs to be aware of both positive as well as concerning.
2. BSEE Safety Initiative status – particularly Safe OCS. LLOG's first meeting on data input into Safe OCS is set with the BLS folks on Monday so we are gearing up to input data. Any info on the number of operators that are and will be participating in the program going forward? I have been working with Demetria Collins on a Safe OCS module that would pilot the FAA/Airline model protocol, I feel we still have some work to do before re-engaging with BSEE on this potential initiative – however, any positive comments you could make in that direction would be appreciated.
3. Any other Initiatives of Note:
 - a. Rulemaking - If the well control final rule is issued, perhaps you can comment on that rulemaking as well. If it is not released by April we fully understand that any discussion on that topic is internal to BSEE until released.
 - b. BAST
 - c. SEMS

In my opinion there has been too much press focused on regulatory changes where any change is almost automatically deemed a compromise to safety. Based on my review of recent BSEE actions and the proposed final rule on well control – there are no actual concessions to safety, but rather the changes represent a clarification of existing rules or an actual change that will improve safety. Thus, I feel a presentation/talk focused on the “S” in BSEE is very timely.

Let me know if you have any questions. I hope you can join us.

Joseph Leimkuhler
Vice President – Drilling, LLOG Exploration L.L.C.

<image001.png>

1001 Ochsner Blvd., Suite 100
Covington, Louisiana 70433
(985) 801-4300

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Conversation Contents

[EXTERNAL] NOIA Speaking Opportunity - NOIA COn tact Info

Joe Leimkuhler <jml@llog.com>

From: Joe Leimkuhler <jml@llog.com>
Sent: Wed Feb 13 2019 09:26:03 GMT-0700 (MST)
To: "Angelico, Eileen" <eileen.angelico@bsee.gov>
Scott Angelle <scott.angelle@bsee.gov>, Randall Luthi <rluthi@noia.org>, "Beard, Preston" <preston.beard@bsee.gov>,
CC: "Mcbrady, Monica" <monica.mcbrady@bsee.gov>, "jwilliams@noia.org" <jwilliams@noia.org>
Subject: [EXTERNAL] NOIA Speaking Opportunity - NOIA COn tact Info

Eileen,

Director Angelle's staff can just send the presentation to Justin Williams at jwilliams@noia.org . Also, if they have any other questions, Justin is more than happy to answer them directly. Justin's contact info is below.

Justin Williams

Senior Director, Digital & Public Affairs

National Ocean Industries Association

1120 G Street NW, Suite 900

Washington, DC 20005

Direct: (202) 465-8464 Main: (202) 347-6900 Cell: (b) (6)

From: Angelico, Eileen [mailto:eileen.angelico@bsee.gov]
Sent: Wednesday, February 13, 2019 10:19 AM
To: Joe Leimkuhler
Cc: Scott Angelle; Randall Luthi; Beard, Preston; Mcbrady, Monica
Subject: Re: [EXTERNAL] NOIA Speaking Opportunity - requested Info

Thanks Joe,

Who should we send the Powerpoint file to in advance of the April 11th presentation?

Looking forward to a great presentation!

Eileen

On Wed, Feb 13, 2019 at 11:16 AM Joe Leimkuhler <jml@llog.com> wrote:

Scott,

Yes the hotel will have projectors that will support both 16:9 and 4:3 dimensions in PowerPoint projections.

From: Scott Angelle [mailto:scott.angelle@bsee.gov]
Sent: Wednesday, February 13, 2019 6:22 AM
To: Joe Leimkuhler
Cc: Angelico, Eileen; Randall Luthi; Beard, Preston; Mcbrady, Monica

Subject: Re: [EXTERNAL] NOIA Speaking Opportunity - requested Info

Good morning. Please confirm the venue will have capabilities to support a power point presentation

Sent from my iPhone

On Jan 29, 2019, at 5:35 PM, Joe Leimkuhler <jml@llog.com> wrote:

Sure thing, see below. Let me know if you need anything else

From: Angelico, Eileen [<mailto:eileen.angelico@bsee.gov>]

Sent: Tuesday, January 29, 2019 4:05 PM

To: Joe Leimkuhler

Cc: Scott Angelle (scott.angelle@bsee.gov); Randall Luthi; Beard, Preston; Mcbrady, Monica

Subject: Re: [EXTERNAL] NOIA Speaking Opportunity

Thanks Joe for your and NOIA's interest in BSEE.

We are currently reviewing the Director's Spring 2019 schedule. I will let you know something as soon as I can. In order for us to give the opportunity full consideration, can you please provide the following information:

Event Title and Organizer: National Ocean Industries Association (NOIA),

Date of Event: April 10th and April 11th 2019 – Time slots are: 2:00 pm on Wednesday April 10th and one at 10:50 am on Thursday April 11, 2019

Location: The Ritz-Carlton Hotel, 1150 22nd St NW, Washington, DC 20037

Topic: Suggested: Safety Update in the US Outer Continental Shelf: Trends and Information

Length and Format of Remarks: Total time 30 minutes, 20 Minutes Talk/Presentation, 10 Mins Q&A

Open or Closed Press: Closed to the Public and Closed to the Press

Nature of Press and Expected Coverage (e.g. trade press, local reporters, national media, etc.): None

Audience: (expected count and representatives of ?): 100-150 – Audience consists of upper management of Operators and Major Service Companies that work in the OCS – predominately the Gulf of Mexico. Operations cover Oil and Gas as well as Wind

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Conversation Contents

API IBAT Slides

Attachments:

/37. API IBAT Slides/1.1 Update on Industry Activities on Subsea BOP Bolting 06292017.pdf
/37. API IBAT Slides/2.1 IBAT Charter 4.6.2017.docx

"Good, Nathan" <nathan.good@bsee.gov>

From: "Good, Nathan" <nathan.good@bsee.gov>
Sent: Thu Jun 29 2017 11:12:51 GMT-0600 (MDT)
Alton Payne <alton.payne@bsee.gov>, Bipin Patel <bipin.patel@bsee.gov>, Candi Hudson <candi.hudson@bsee.gov>, Christopher Oliver <christopher.oliver@bsee.gov>, Christy Lan <christy.lan@bsee.gov>, "David E. Alman" <david.alman@netl.doe.gov>, Doug Morris <douglas.morris@bsee.gov>, "James C JR CIV NSWC Philadelphia, 331 Jennings" <james.c.jennings@navy.mil>, Joseph Levine <joseph.levine@bsee.gov>, Julian Pham <julian.pham@bsee.gov>, Keith Billingsley <keith_billingsley@ios.doi.gov>, Mark Kozak <mark.kozak@bsee.gov>, Michael Riches <mriches@blm.gov>, Neil Funwie <neil.funwie@bsee.gov>, Staci King <staci.king@bsee.gov>, "Timothy J. Foecke (Fed)" <timothy.foecke@nist.gov>, Trang Vu <trang.vu@bsee.gov>, Vincent Burke <vincent.burke@bsee.gov>, "Vincent Holohan (PHMSA)" <vincent.holohan@dot.gov>, bill.cummins@dhs.gov, crane.dan@dol.gov, dakoriye.charles@ferc.gov, david.rudland@nrc.gov, derek.horton@nrl.na.mil, enrique.matheu@hq.dhs.gov, frederick.kachele@navy.mil, fredrick.kachele@navy.mil, hopkinsh <hopkinsh@api.org>, james.fekete@nist.gov, john.d.figert@nasa.gov, john.mchale@nrc.gov, leonardk@oml.gov, michael.budinski@ntsb.gov, michael.budinsky@ntsb.gov, preston.beard@bsee.gov, raj.iyengar@nrc.gov, robert.kolasky@hq.dhs.gov, robert.l.smith12@navy.mil, satyaveda.bharath@dot.gov, slwells@blm.gov, terry.khaled@faa.gov, todd.m.howard@uscg.mil, william.j.cotta@uscg.mil
To:
Subject: API IBAT Slides
Attachments: Update on Industry Activities on Subsea BOP Bolting 06292017.pdf

—
Nathan Good
Mechanical Engineer
Emerging Technologies Branch - Systems Reliability Section (SRS)
Bureau of Safety and Environmental Enforcement - DOI
Office: (703) 787-1680

"Good, Nathan" <nathan.good@bsee.gov>

From: "Good, Nathan" <nathan.good@bsee.gov>
Sent: Thu Jun 29 2017 11:48:12 GMT-0600 (MDT)
Alton Payne <alton.payne@bsee.gov>, Bipin Patel <bipin.patel@bsee.gov>, Candi Hudson <candi.hudson@bsee.gov>, Christopher Oliver <christopher.oliver@bsee.gov>, Christy Lan <christy.lan@bsee.gov>, "David E. Alman" <david.alman@netl.doe.gov>, Doug Morris <douglas.morris@bsee.gov>, "James C JR CIV NSWC Philadelphia, 331 Jennings" <james.c.jennings@navy.mil>, Joseph Levine <joseph.levine@bsee.gov>, Julian Pham <julian.pham@bsee.gov>, Keith Billingsley <keith_billingsley@ios.doi.gov>, Mark Kozak <mark.kozak@bsee.gov>, Michael Riches <mriches@blm.gov>, Neil Funwie <neil.funwie@bsee.gov>, Staci King <staci.king@bsee.gov>, "Timothy J. Foecke (Fed)" <timothy.foecke@nist.gov>, Trang Vu <trang.vu@bsee.gov>, Vincent Burke <vincent.burke@bsee.gov>, "Vincent Holohan (PHMSA)" <vincent.holohan@dot.gov>, bill.cummins@dhs.gov, crane.dan@dol.gov, dakoriye.charles@ferc.gov, david.rudland@nrc.gov, derek.horton@nrl.na.mil, enrique.matheu@hq.dhs.gov, frederick.kachele@navy.mil, fredrick.kachele@navy.mil, hopkinsh <hopkinsh@api.org>, james.fekete@nist.gov, john.d.figert@nasa.gov, john.mchale@nrc.gov, leonardk@oml.gov, michael.budinski@ntsb.gov, michael.budinsky@ntsb.gov, preston.beard@bsee.gov, raj.iyengar@nrc.gov, robert.kolasky@hq.dhs.gov, robert.l.smith12@navy.mil, satyaveda.bharath@dot.gov, slwells@blm.gov, terry.khaled@faa.gov, todd.m.howard@uscg.mil, william.j.cotta@uscg.mil, "Melchert, Elena" <Elena.Melchert@hq.doe.gov>
To:
Subject: Re: API IBAT Slides
Attachments: IBAT Charter 4.6.2017.docx

On Thu, Jun 29, 2017 at 1:12 PM, Good, Nathan <nathan.good@bsee.gov> wrote:

—
Nathan Good
Mechanical Engineer
Emerging Technologies Branch - Systems Reliability Section (SRS)
Bureau of Safety and Environmental Enforcement - DOI
Office: (703) 787-1680

—
Nathan Good
Mechanical Engineer
Emerging Technologies Branch - Systems Reliability Section (SRS)
Bureau of Safety and Environmental Enforcement - DOI
Office: (703) 787-1680

Holly Hopkins <hopkinsh@api.org>

From: Holly Hopkins <hopkinsh@api.org>
Sent: Thu Jun 29 2017 20:30:57 GMT-0600 (MDT)
"Good, Nathan" <nathan.good@bsee.gov>, Alton Payne <alton.payne@bsee.gov>, Bipin Patel <bipin.patel@bsee.gov>, Candi Hudson <candi.hudson@bsee.gov>, Christopher Oliver <christopher.oliver@bsee.gov>, Christy Lan <christy.lan@bsee.gov>, "David E. Alman" <david.alman@netl.doe.gov>, Doug Morris <douglas.morris@bsee.gov>, "James C JR CIV NSWC Philadelphia, 331 Jennings" <james.c.jennings@navy.mil>, Joseph Levine <joseph.levine@bsee.gov>, Julian Pham <julian.pham@bsee.gov>, Keith Billingsley <keith_billingsley@ios.doi.gov>, Mark Kozak <mark.kozak@bsee.gov>, Michael Riches <mriches@blm.gov>, Neil Funwie <neil.funwie@bsee.gov>, Staci King <staci.king@bsee.gov>, "Timothy J. Foecke (Fed)" <timothy.foecke@nist.gov>, Trang Vu <trang.vu@bsee.gov>, Vincent Burke <vincent.burke@bsee.gov>, "Vincent Holohan (PHMSA)" <vincent.holohan@dot.gov>, "bill.cummins@dhs.gov" <bill.cummins@dhs.gov>, "crane.dan@dol.gov" <crane.dan@dol.gov>, "dakoriye.charles@ferc.gov" <dakoriye.charles@ferc.gov>, "david.rudland@nrc.gov" <david.rudland@nrc.gov>, "derek.horton@nrl.na.mil" <derek.horton@nrl.na.mil>, "enrique.matheu@hq.dhs.gov" <enrique.matheu@hq.dhs.gov>, "frederick.kachele@navy.mil" <frederick.kachele@navy.mil>, "fredrick.kachele@navy.mil" <fredrick.kachele@navy.mil>, "james.fekete@nist.gov" <james.fekete@nist.gov>, "john.d.figert@nasa.gov" <john.d.figert@nasa.gov>, "john.mchale@nrc.gov" <john.mchale@nrc.gov>, "leonardk@ornl.gov" <leonardk@ornl.gov>, "michael.budinski@ntsb.gov" <michael.budinski@ntsb.gov>, "michael.budinsky@ntsb.gov" <michael.budinsky@ntsb.gov>, "preston.beard@bsee.gov" <preston.beard@bsee.gov>, "raj.iyengar@nrc.gov" <raj.iyengar@nrc.gov>, "robert.kolasky@hq.dhs.gov" <robert.kolasky@hq.dhs.gov>, "robert.l.smith12@navy.mil" <robert.l.smith12@navy.mil>, "satyaveda.bharath@dot.gov" <satyaveda.bharath@dot.gov>, "slwells@blm.gov" <slwells@blm.gov>, "terry.khaled@faa.gov" <terry.khaled@faa.gov>, "todd.m.howard@uscg.mil" <todd.m.howard@uscg.mil>, "william.j.cotta@uscg.mil" <william.j.cotta@uscg.mil>
To:
Subject: Re: API IBAT Slides

Joe,

API 20E requires that all bolt manufacturers, regardless of the bolting specification level (BSL), shall have a QMS that conforms to API Q1.

All qualification tests shall be performed by a lab qualified to ISO 17025.

Raw material suppliers to the bolt manufacturer shall have a QMS conforming to ISO 9001 or API Q1.

The QMSs of subcontracted suppliers of the following processes, regardless of the BSL, shall be evaluated in accordance with ISO [9001, API Q1 or ISO 17025](#):

- a) head forging/head forming of individual fasteners;
- b) heat treatment;
- c) threading;
- d) plating/coating;
- e) NDE;
- f) mechanical and hardness testing;
- g) metallurgical examination as specified in 5.8;
- h) chemical analysis.

Please let me know if you have additional questions.

Thanks,
Holly Hopkins

Sent from my Verizon, Samsung Galaxy smartphone

----- Original message -----

From: "Good, Nathan" <nathan.good@bsee.gov>
Date: 6/29/17 1:13 PM (GMT-05:00)
To: Alton Payne <alton.payne@bsee.gov>, Bipin Patel <bipin.patel@bsee.gov>, Candi Hudson <candi.hudson@bsee.gov>, Christopher Oliver <christopher.oliver@bsee.gov>, Christy Lan <christy.lan@bsee.gov>, "David E. Alman" <david.alman@netl.doe.gov>, Doug Morris <douglas.morris@bsee.gov>, "James C JR CIV NSWC Philadelphia, 331 Jennings" <james.c.jennings@navy.mil>, Joseph Levine <joseph.levine@bsee.gov>, Julian Pham <julian.pham@bsee.gov>, Keith Billingsley <keith_billingsley@ios.doi.gov>, Mark Kozak <mark.kozak@bsee.gov>, Michael Riches <mriches@blm.gov>, Neil Funwie <neil.funwie@bsee.gov>, Staci King <staci.king@bsee.gov>, "Timothy J. Foecke (Fed)" <timothy.foecke@nist.gov>, Trang Vu <trang.vu@bsee.gov>, Vincent Burke <vincent.burke@bsee.gov>, "Vincent Holohan (PHMSA)" <vincent.holohan@dot.gov>, bill.cummins@dhs.gov, crane.dan@dol.gov, dakoriye.charles@ferc.gov, david.rudland@nrc.gov, derek.horton@nrl.na.mil, enrique.matheu@hq.dhs.gov, frederick.kachele@navy.mil, fredrick.kachele@navy.mil, Holly Hopkins <hopkinsh@api.org>, james.fekete@nist.gov, john.d.figert@nasa.gov, john.mchale@nrc.gov, leonardk@ornl.gov, michael.budinski@ntsb.gov, michael.budinsky@ntsb.gov, preston.beard@bsee.gov, raj.iyengar@nrc.gov, robert.kolasky@hq.dhs.gov, robert.l.smith12@navy.mil, satyaveda.bharath@dot.gov, slwells@blm.gov, terry.khaled@faa.gov, todd.m.howard@uscg.mil, william.j.cotta@uscg.mil
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Sent: Fri Jun 30 2017 05:49:00 GMT-0600 (MDT)
To: Holly Hopkins <hopkinsh@api.org>
"Good, Nathan" <nathan.good@bsee.gov>, Alton Payne <alton.payne@bsee.gov>, Bipin Patel <bipin.patel@bsee.gov>, Candi Hudson <candi.hudson@bsee.gov>, Christopher Oliver <christopher.oliver@bsee.gov>, Christy Lan <christy.lan@bsee.gov>, "David E. Alman" <david.alman@netl.doe.gov>, Doug Morris <douglas.morris@bsee.gov>, "James C JR CIV NSWC Philadelphia, 331 Jennings" <james.c.jennings@navy.mil>, Julian Pham <julian.pham@bsee.gov>, Keith Billingsley <keith_billingsley@ios.doi.gov>, Mark Kozak <mark.kozak@bsee.gov>, Michael Riches <mriches@blm.gov>, Neil Funwie <neil.funwie@bsee.gov>, Staci King <staci.king@bsee.gov>, "Timothy J. Foecke (Fed)" <timothy.foecke@nist.gov>, Trang Vu <trang.vu@bsee.gov>, Vincent Burke <vincent.burke@bsee.gov>, "Vincent Holohan (PHMSA)" <vincent.holohan@dot.gov>, "bill.cummins@dhs.gov" <bill.cummins@dhs.gov>, "crane.dan@dol.gov" <crane.dan@dol.gov>, "dakoriye.charles@ferc.gov" <dakoriye.charles@ferc.gov>, "david.rudland@nrc.gov" <david.rudland@nrc.gov>, "derek.horton@nrl.na.mil" <derek.horton@nrl.na.mil>, "enrique.matheu@hq.dhs.gov" <enrique.matheu@hq.dhs.gov>, "frederick.kachele@navy.mil" <frederick.kachele@navy.mil>, "james.fekete@nist.gov" <james.fekete@nist.gov>, "john.d.figert@nasa.gov" <john.d.figert@nasa.gov>, "john.mchale@nrc.gov" <john.mchale@nrc.gov>, "leonardk@ornl.gov" <leonardk@ornl.gov>, "michael.budinski@ntsb.gov" <michael.budinski@ntsb.gov>, "michael.budinsky@ntsb.gov" <michael.budinsky@ntsb.gov>, "preston.beard@bsee.gov" <preston.beard@bsee.gov>, "raj.iyengar@nrc.gov" <raj.iyengar@nrc.gov>, "robert.kolasky@hq.dhs.gov" <robert.kolasky@hq.dhs.gov>, "robert.l.smith12@navy.mil" <robert.l.smith12@navy.mil>, "satyaveda.bharath@dot.gov" <satyaveda.bharath@dot.gov>, "slwells@blm.gov" <slwells@blm.gov>, "terry.khaled@faa.gov" <terry.khaled@faa.gov>, "todd.m.howard@uscg.mil" <todd.m.howard@uscg.mil>, "william.j.cotta@uscg.mil" <william.j.cotta@uscg.mil>
CC:
Subject: Re: API IBAT Slides

Thanks holly

Sent from my iPhone

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- g) metallurgical examination as specified in 5.8;
- h) chemical analysis.

Please let me know if you have additional questions.

Thanks,
Holly Hopkins

Sent from my Verizon, Samsung Galaxy smartphone

----- Original message -----

From: "Good, Nathan" <nathan.good@bsee.gov>

Date: 6/29/17 1:13 PM (GMT-05:00)

To: Alton Payne <alton.payne@bsee.gov>, Bipin Patel <bipin.patel@bsee.gov>, Candi Hudson <candi.hudson@bsee.gov>, Christopher Oliver <christopher.oliver@bsee.gov>, Christy Lan <christy.lan@bsee.gov>, "David E. Alman" <david.alman@netl.doe.gov>, Doug Morris <douglas.morris@bsee.gov>, "James C JR CIV NSWC Philadelphia, 331 Jennings" <james.c.jennings@navy.mil>, Joseph Levine <joseph.levine@bsee.gov>, Julian Pham <julian.pham@bsee.gov>, Keith Billingsley <keith_billingsley@ios.doi.gov>, Mark Kozak <mark.kozak@bsee.gov>, Michael Riches <mriches@blm.gov>, Neil Funwie <neil.funwie@bsee.gov>, Staci King <staci.king@bsee.gov>, "Timothy J. Foecke (Fed)" <timothy.foecke@nist.gov>, Trang Vu <trang.vu@bsee.gov>, Vincent Burke <vincent.burke@bsee.gov>, "Vincent Holohan (PHMSA)" <vincent.holohan@dot.gov>, bill.cummins@dhs.gov, crane.dan@dol.gov, dakoriye.charles@ferc.gov, david.rudland@nrc.gov, derek.horton@nrl.na.mil, enrique.matheu@hq.dhs.gov, frederick.kachele@navy.mil, frederick.kachele@navy.mil, Holly Hopkins <hopkinsh@api.org>, james.fekete@nist.gov, john.d.figert@nasa.gov, john.mchale@nrc.gov, leonardk@ornl.gov, michael.budinski@ntsb.gov, michael.budinsky@ntsb.gov, preston.beard@bsee.gov, raj.iyengar@nrc.gov, robert.kolasky@hq.dhs.gov, robert.l.smith12@navy.mil, satyaveda.bharath@dot.gov, slwells@blm.gov, terry.khaled@faa.gov, todd.m.howard@uscg.mil, william.j.cotta@uscg.mil

Subject: API IBAT Slides

--

Nathan Good
Mechanical Engineer
Emerging Technologies Branch - Systems Reliability Section (SRS)
Bureau of Safety and Environmental Enforcement - DOI
Office: (703) 787-1680

Update on Industry Activities on Subsea BOP Bolting

**Interagency Bolt Action Team (IBAT) Meeting
June 29, 2017**

**Holly A. Hopkins
Sr. Policy Advisor, Upstream
American Petroleum Institute**

Overview

- **Industry would like to share work that has been undertaken to address Subsea Blowout Preventer (BOP) bolting issues**
 - **Review of the API Standards Process**
 - **Review of the API Multi-Segment Task Group Recommendations**
 - **Review of the API Safety Alert (318) Workgroup Activities**
- **Work to date has benefited from ongoing collaboration between Operators, Rig Contractors and Original Equipment Owners (OEMs)**
- **Industry has been engaged with BSEE on the issue since 2014**
- **Committed to a collaborative working relationship moving forward**
- **Industry looks forward to continued engagement with BSEE and other parties in efforts to address the issue**

API Standards Program Mission

**Provide a forum for development of
consensus-based industry standards, and
technical cooperation to improve the
industry's safety performance and
competitiveness**

API Standards Program

- ❖ **API formed in 1919, Standards Department formed in 1923 as one of three initial API foundational programs**
- ❖ **First standards published in 1924 on pipe sizes, threads, and couplings**
- ❖ **All industry segments now active in standards work**
 - **Exploration and Production**
 - **Refining**
 - **Marketing**
 - **Pipeline Transportation**
 - **Petroleum Measurement**

API Standards Program

- ❖ **API publishes ~700 technical standards covering all aspects of the oil and of the oil and natural gas industry**
- ❖ **One-third of all API standards are referenced in the U.S. regulations**
- ❖ **Over 7000 active volunteers representing over 50 countries**

API Standards Program

- ❖ **Basis for company operations worldwide**
- ❖ **Foundation of API quality and certification programs**
- ❖ **API is accredited by the American National Standards Institute (ANSI)**
 - **Transparent process**
 - **Openness, balance, consensus, due process**
 - **Program audited by ANSI every five years**

API Standards Committees

**Committee on
Standardization of
Oilfield Equipment &
Materials (CSOEM)**

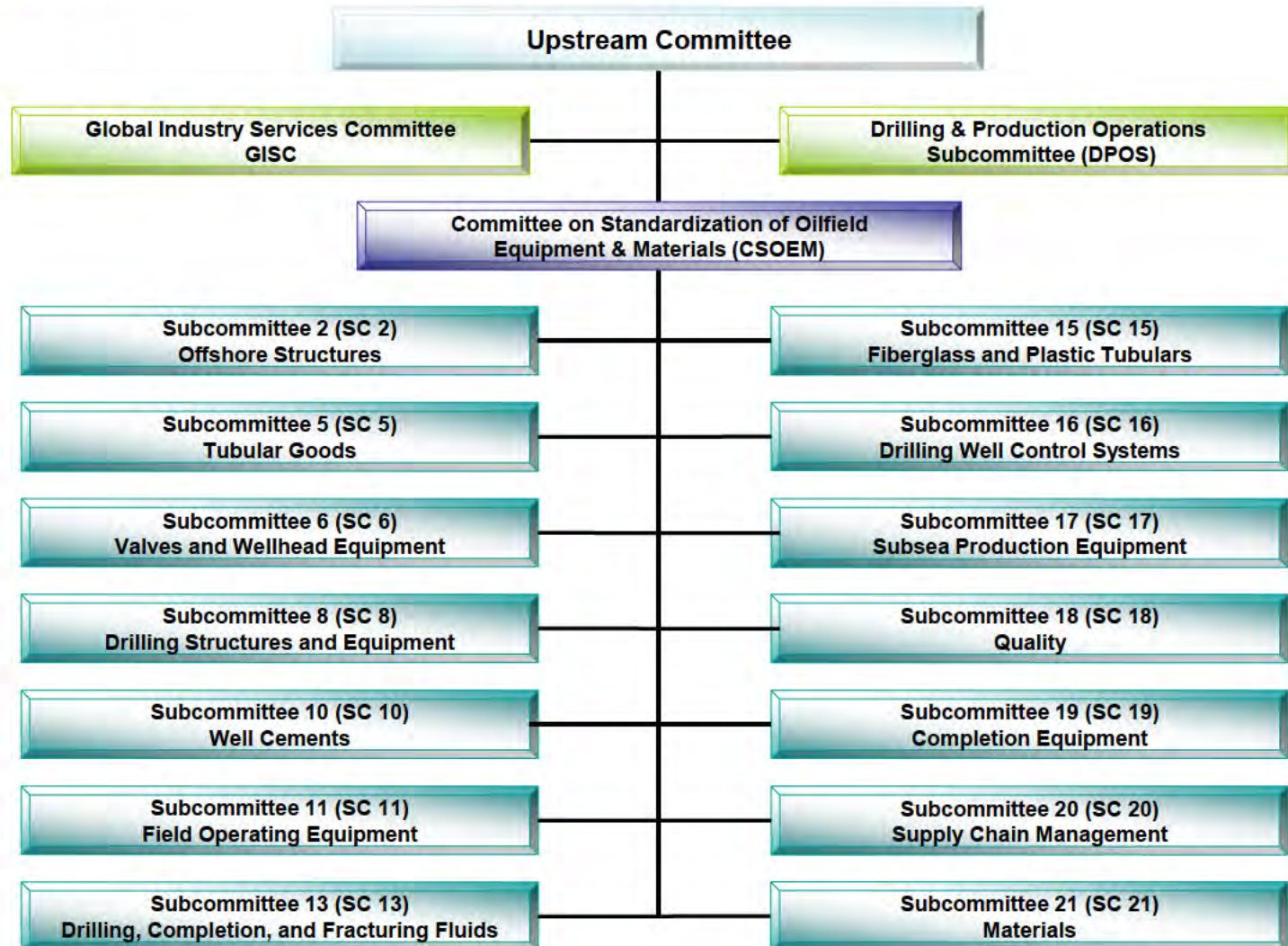
**Drilling and Production
Operations Subcommittee
(DPOS)**

**Committee on Refinery
Equipment
(CRE)**

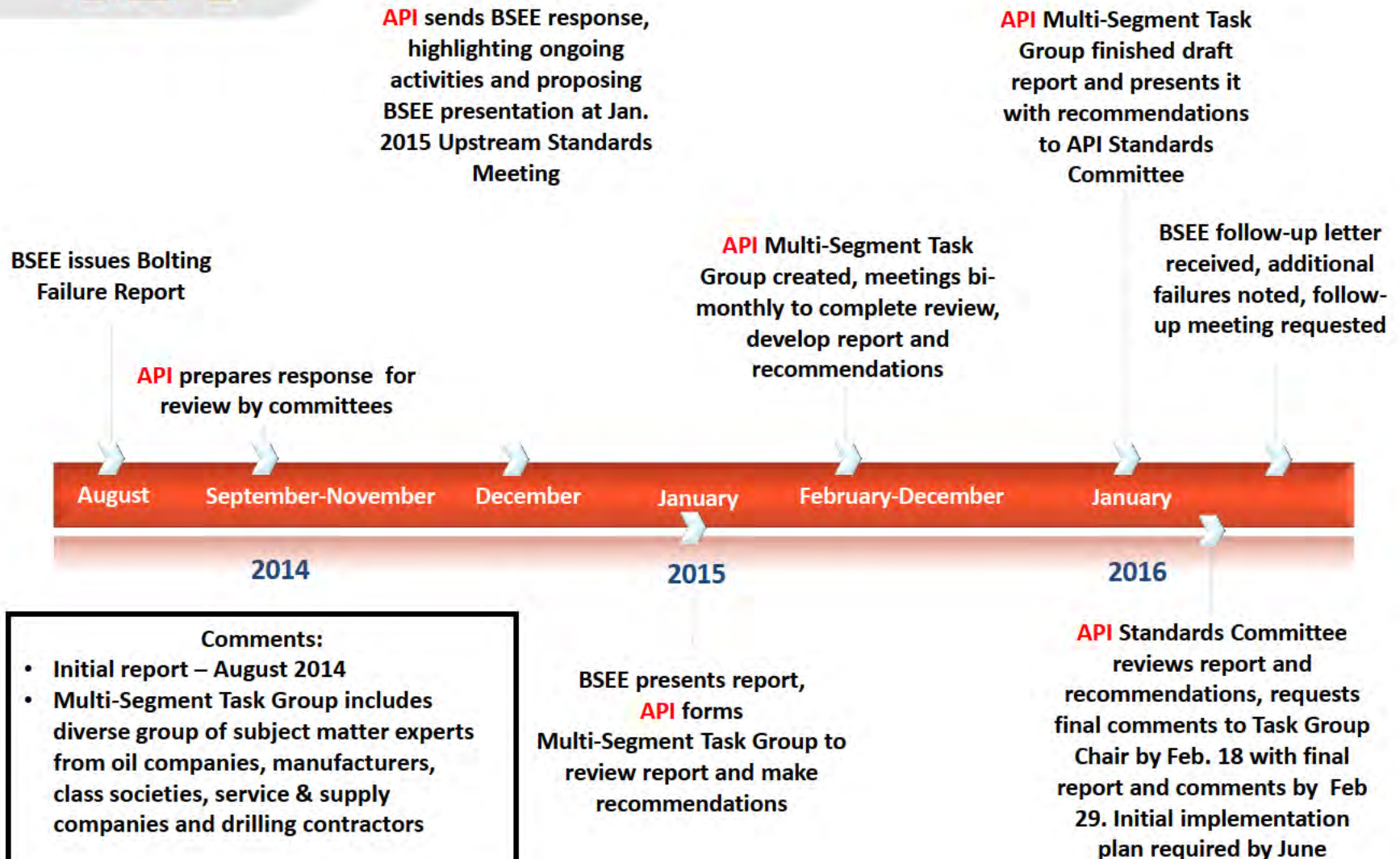
**Committee on
Petroleum Measurement
(COPM)**

- **Midstream (Pipeline & Rail Transportation)**
- **Safety & Fire Protection**
- **Marketing**

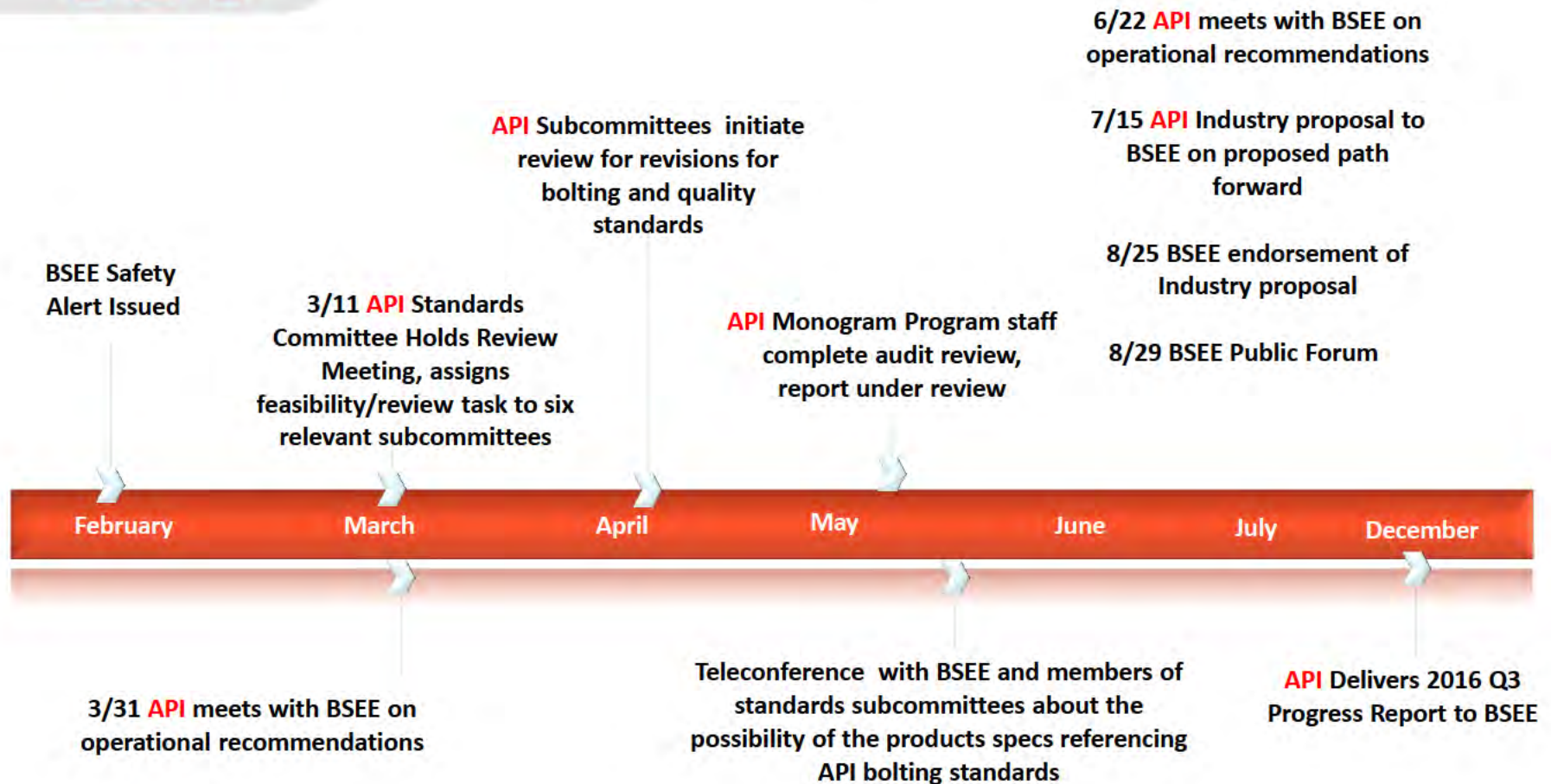
Upstream Standards Committees



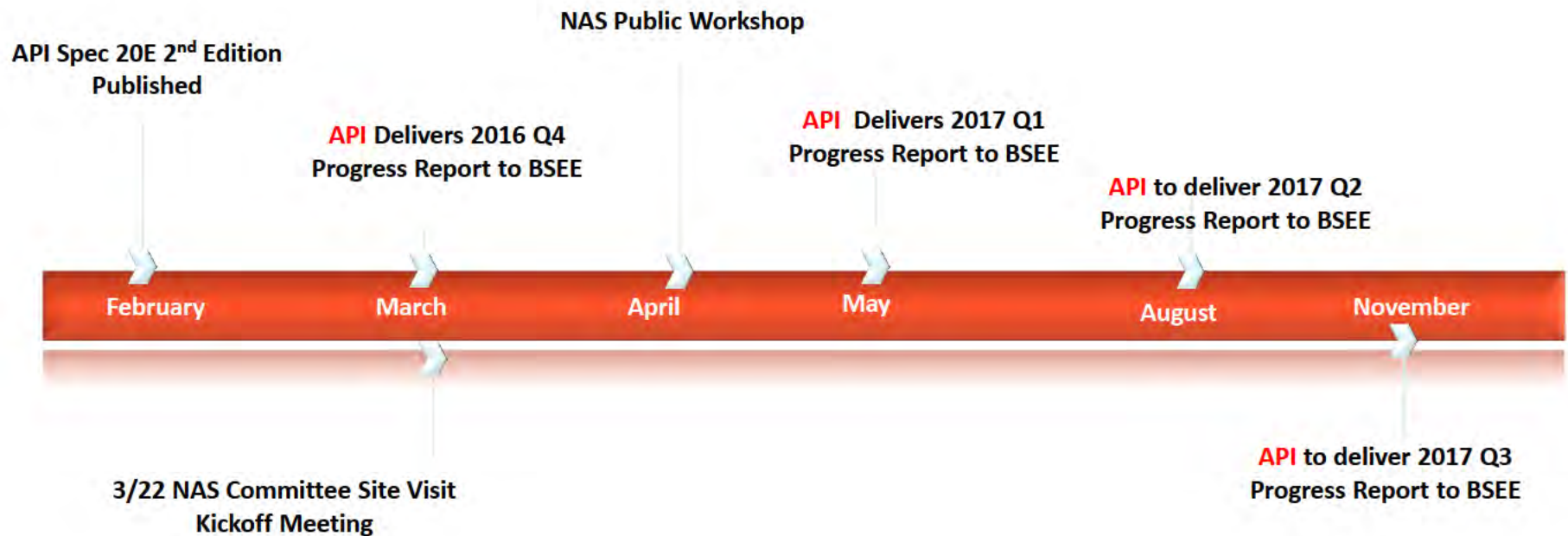
Bolting Timeline



Bolting Timeline 2016



Bolting Timeline 2017





Industry Focus Areas

Research

- Review existing research
- Work with BSEE on the terms of reference for upcoming research projects
- 2017 project to perform testing to determine susceptibility to environmental hydrogen embrittlement of selected materials and coatings

Standards

- Enhance applicable bolting requirements in multiple API standards

Quality Assurance, Quality Control

- Review latest requirements to determine if additional updates are needed

Operations

- Established diverse industry work groups composed of Operators, Drilling Contractors and Original Equipment Manufacturers (OEMs)
- Focused on near and longer term operational activities

Multi Segment TG on Bolting Failures

Initial driver for Formation of the Task Group

- **QC-FIT Evaluation of Connector and Bolt Failures
Summary of Findings – BSEE 2014-01 Report**

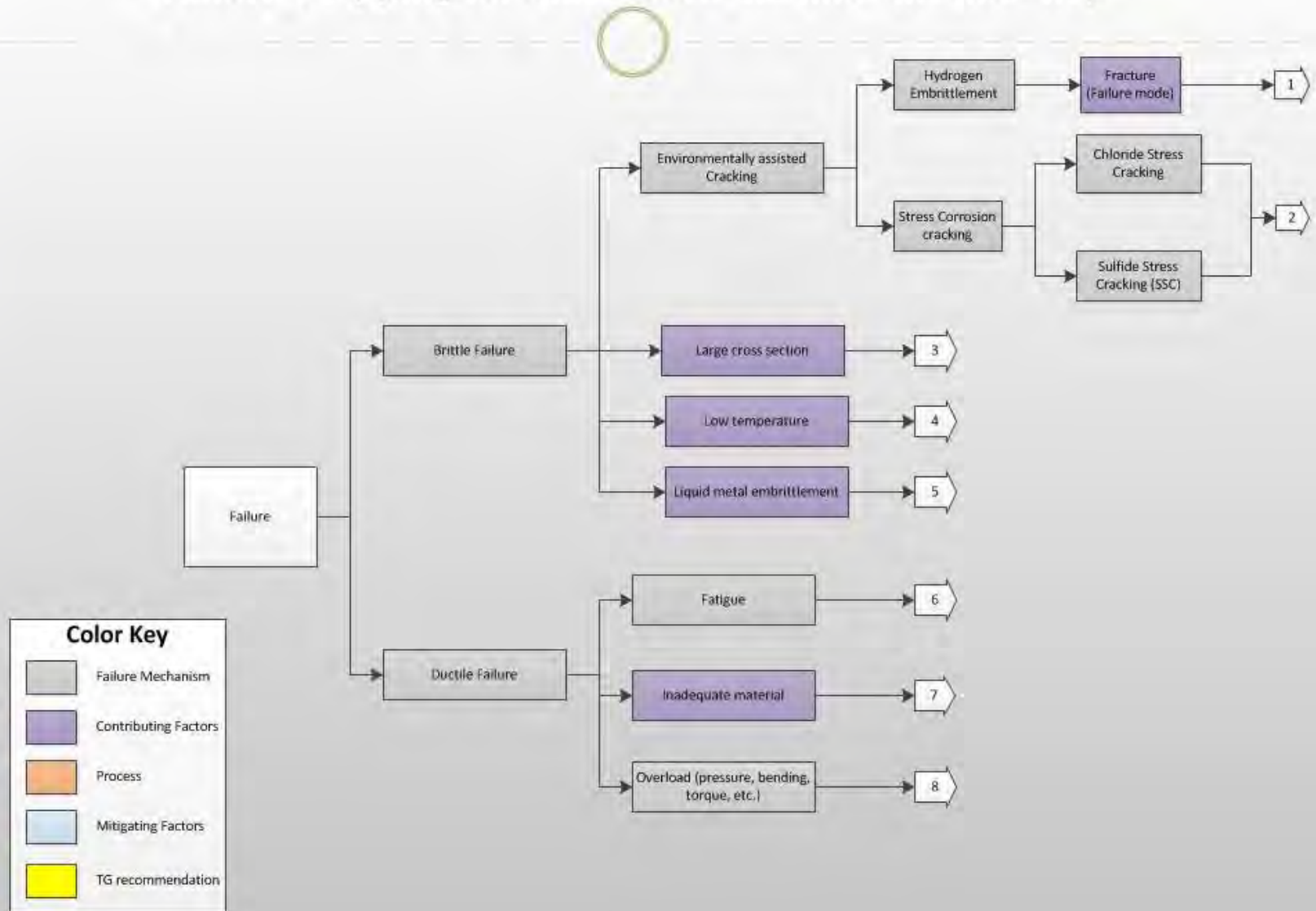
Final charge of Task Group

- **Evaluate types of bolting failures likely to occur in the upstream oil and gas industry and report findings and recommendations to CSOEM**
- **Determine contributing factors, identifying current mitigations and recommend changes to industry standards.**

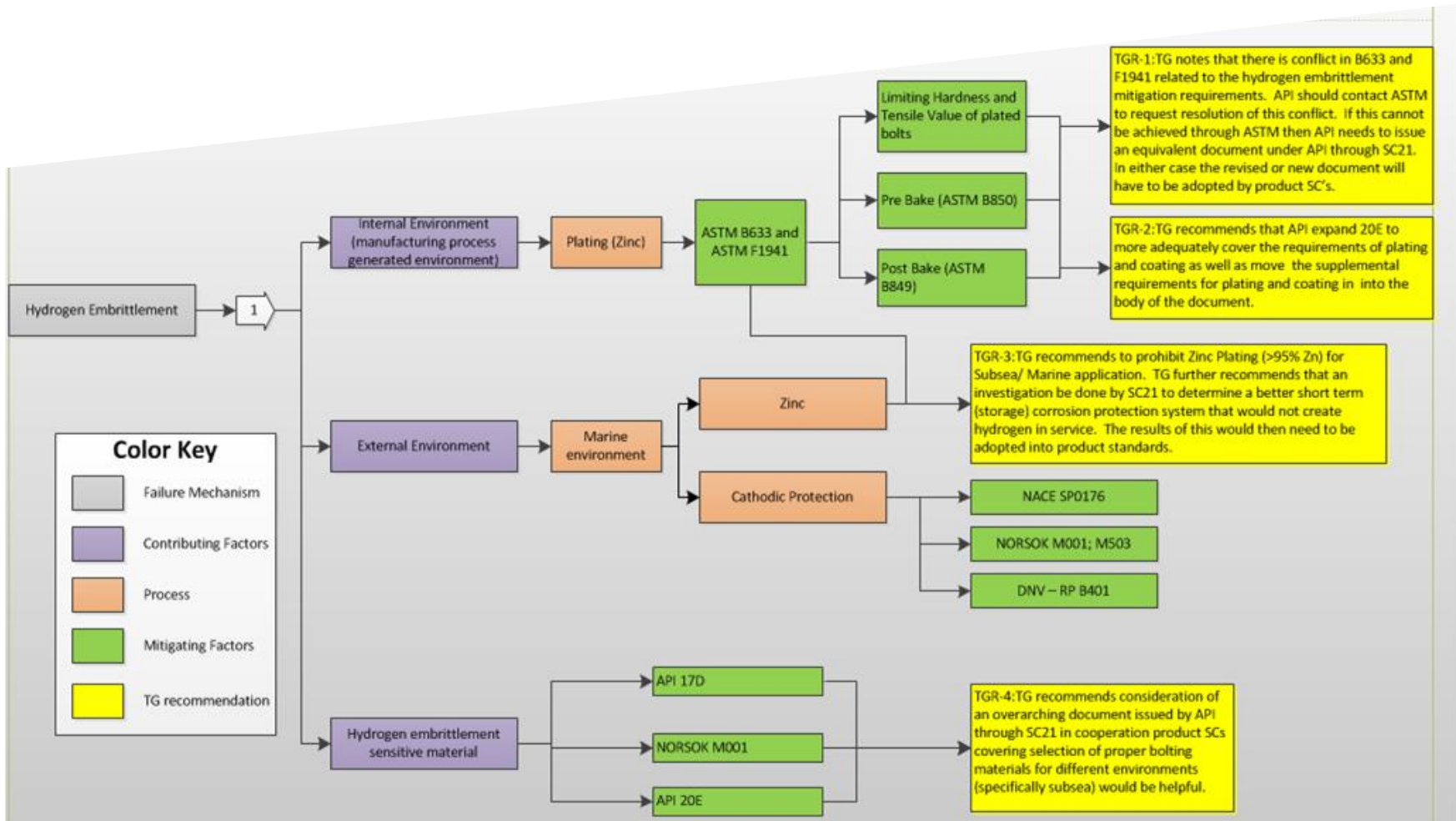
Multi Segment TG on Bolting Failures Approach

- **Identify failure mechanisms that affect bolting in the oil and gas industry**
- **Identify contributing factors and associated processes around those failure mechanisms**
- **Identify existing mitigations across the industry including both API and other industry controls**
- **Make recommendations where current mitigations are deemed to be inadequate**

Failure Mapping for Bolts in the Oil and Gas Industry



Hydrogen embrittlement Map





TG recommendation summary

TGR-1: TG notes that there is conflict between B633 and F1941 related to requirements for hydrogen embrittlement mitigation. B633 requires stress-relief and bake for product greater than 31 HRC. F1941 does not require stress-relief and requires bake for product greater than 39 HRC. API should contact ASTM to request resolution of this conflict. If this cannot be achieved through ASTM, then API needs to issue an equivalent document under API through SC21. In either case, the revised or new document will then need to be adopted by product SCs. This work should also include requirements for maximum hardness on bolting material.

TGR-2: TG recommends that API expand 20E to more adequately cover the requirements of plating and coating as well as move the supplemental requirements for plating and coating into the body of the document, making them standard requirements.

TGR-3: TG recommends prohibiting Zinc electroplating for Subsea/Marine application. TG further recommends that an investigation be conducted under the direction of SC21 to determine a better short term (storage) corrosion protection system that would not create hydrogen in service. The results of this study would then need to be adopted into product standards.



TG recommendation summary

- TGR-4: TG recommends consideration of an overarching document issued by API through SC21 in cooperation with product SCs covering selection of proper bolting materials for different environments (including subsea) would be helpful.**
- TGR-5: TG recommends that the product specifications require equipment manufacturers to specify acceptable thread compounds for bolting applications based on material, plating and service.**
- TGR-6: Torqueing requirements should be reviewed to determine if standardization among product specifications is needed.**
- TGR-7 TG recommends modification of 6A to require impact testing at or below design temperature w/ acceptance criteria for larger cross section bolting (over 2.5").**
- TGR-8: Do not allow use of B7 or L7 grades above 2.5" in diameter. TG recommends that this be included as part of the overarching document under SC21.**
- TGR-9: TG recommends that volumetric examination where bolt diameter exceeds 2.5" should be added as a requirement to 20E, 20F, BSL-2, and BSL-3.**
- TGR-10: TG recommends modification of 6A to require impact testing at or below design temperature w/ acceptance criteria for larger cross section bolting (over 2.5").**
- TGR-11: Revise 20F to restrict use of sulfur based lubricants during manufacture of bolting.**
- TGR-12: TG recommends adding requirements to API product specifications to restrict combining these elements in thread compounds.**
- TGR-13: Guidance should be issued by API on when and how to perform fatigue sensitivity analysis on bolting.**



TG recommendation summary

- TGR-14:** Involved API SC's should address guidance issued in the product specs to require use of BSL-3 in fatigue sensitive applications.
- TGR-15:** TG recommends revision to API S53 to define a standard method for calculating watch circle.
- TGR-16:** TG recommends API issue a document to provide guidance on derating of bolting. There are several specifications on material derating due to elevated temperature.
- TGR-17:** Strengthen heat treating and furnace loading requirements in 20E and 20F (more prescriptive requirements related to: spacing, QTC location, and thermocouple placement). Include requirements for oven calibration for pre and post bake operations.
- TGR-18:** Product subcommittees should review and consider incorporating 20E and 20F requirements (resolve existing conflicting properties specified in product specifications such as hardness).
- TGR-19:** SC18 to form a TG to review the BSEE FIT-QC Report on connector bolt failures to determine if the current requirements of API Spec Q1 has the provisions needed to ensure that system control features are in place, and clearly stated, to eliminate these type of failures in the future.
- TGR-20:** SC20 review the supplier controls in 20E and 20F to ensure these adequately cover required controls for subcontracted processes. SC 20 should also monitor the API Q1 revisions.

API Specification 20E



1. API 20E includes requirements for the qualification, production and documentation of carbon, alloy steel and corrosion resistant alloy (CRA) bolting used in the petroleum and natural gas industries
2. Key topics covered
 - a) Raw Material requirements
 - b) Manufacturing controls (including forging, thread forming)
 - c) Heat treatment
 - d) Microstructure
 - e) Hardness
 - f) Testing
 - g) Traceability to the heat treat lot
 - h) Licensing requirements
3. Per specification, the definition of bolting – Section 3.1.1:
 - a) All-thread studs, tap-end studs, double-ended studs, headed bolts, cap screws, screws, and nuts

API Specification 20E



Alloy and Carbon Steel Bolting for Use in the Petroleum and Natural Gas Industries, 2nd Edition

The Second Edition of API 20E retains the rigorous controls established in the First Edition. However the Second Edition includes additional useful and important requirements. These can be summarized as follows.

- **Requirements for suppliers of subcontracted processes:** Section added to provide for qualification and control of suppliers.
- **Requirements for plating/coating:** Section added to provide for procurement and control of plating and coating. Section has measures for the prevention of hydrogen embrittlement and includes a prohibition on electrodeposited zinc coating.
- **Requirements for proprietary bolting material specification:** Clarified use of such specifications.
- **Definition of Bolting Manufacturer:** Added definition.
- **Heat treatment control:** Expanded requirements for control of the heat treat process, particularly at the higher BSLs.
- **Forging/ Hot heading control:** Added specific requirements for these processes including control of heating.
- **QMS requirements:** Added mandatory compliance to ISO 9001, API Q1 and, ISO 17025 in appropriate sections.

List of API Standards Currently Being Revised

6A, 21st Edition
- Will require conformance to API 20E bolts.

20E, 2nd Edition (Published)

6DSS 3rd Edition
- Will require conformance to API 20E and API 20F for pressure boundary bolts.

20F, 2nd Edition

16A, 4th Edition
- Published
- Requires conformance to API 20E and API 20F for pressure controlling bolting, closure bolting and pressure retaining bolting.

53, 5th Edition

List of API Standards Currently Being Revised

16AR, 1st Edition

- Published
- Requires conformance to API 20E and API 20F for pressure controlling bolting, closure bolting and pressure retaining bolting.

64, 3rd Edition

- In publication
- Will require conformance to API 20E and API 20F for primary and closure bolting.

16C, 3rd Edition

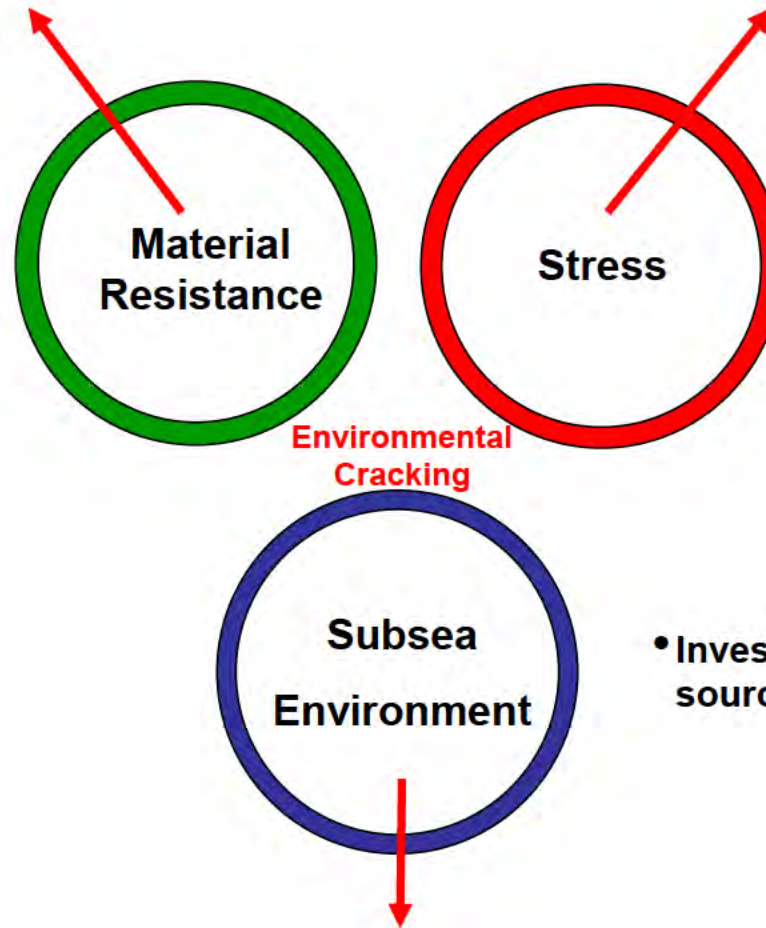
Q1, 9th Edition (Addendum 2)

16F, 2nd Edition

- Will require conformance to API 20E and API 20F.

Factors Proactively Addressed by Industry Workgroup on Bolt Issue

- Manufacturing and testing requirements



- Perform torque at rig per procedure with additional oversight

- Investigate and minimize probable sources for environmental cracking



Voluntary Actions taken by Industry

- 1. Engaged Operators, Rig Contractors and OEMs**
- 2. Developed Multi-Segment Task Group Report with recommendations related to improvements in standards/technical programs to address bolt issue (Feb. 2016)**
- 3. Established Workgroup to provide recommended path forward for operations (and respond to safety alert):**
 - a) Defined “critical bolting” as bolting that the failure of which could result in loss of containment of wellbore fluids to the environment; focus of recommendations**
 - b) Increased adoption of API bolting specifications**
 - c) Upgrade of critical bolting at higher risk (i.e. potential hardness issue)**
 - d) Enhanced quality assurance/quality control**
 - e) Updated make-up procedures, with additional engineering rigor and oversight**
 - f) Elimination of electroplated zinc coatings**
 - g) Enhanced failure reporting with wider distribution**



Quarterly Updates to BSEE

3Q 2016	Delivered December 9, 2016
4Q 2016	Delivered March 16, 2016
1Q 2017	Delivered May 5, 2017
2Q 2017	To be Delivered August 4, 2017

Includes Progress On:

Research

Materials/Standards

QA/QC

Equipment Manufactures Operations

Equipment Owner Operations

Summary of Progress on Equipment Owner Operations (Q1, 2017)

			Not Started		In-Progress		Completed	
Total Number of Active BOPs = 39			Number	Percent	Number	Percent	Number	Percent
Item	Topic	Discussion						
2017 Deliverables								
1	Replacement 20 E/F bolts for all > 35 HRC critical bolting ordered	List by rig the % of API 20 E replacement bolts ordered	4	10%	4	10%	31	79%
2	Replacement 20 E/F bolts for all > 35 HRC critical bolting installed	List by rig the % of API 20 E bolts installed on the BOP	21	54%	2	5%	16	41%
3	Rig Procedure for torquing of critical bolting	Can include example rig procedure	0	0%	16	41%	23	59%
4	Internal process for enhanced failure reporting of critical bolts (IOGP Failure reporting procedure)	Can include example procedure for compliance with IOGP Failure reporting	0	0%	0	0%	39	100%
5	MTR review for installed critical bolting:	Can include letter from OEM, example of MTR audit	0	0%	17	44%	22	56%
	- OEM SOF critical bolting per relevant specification		0	0%	12	31%	27	69%
	- MTRs per relevant specification		2	5%	8	21%	29	74%
	- Bolting audit to verify MTR information		9	23%	7	18%	23	59%
6	Preventative maintenance (PM) for BOP bolting API Std 53	Can include PM for BOP bolting maintenance. Example of NDE performed on BOP bolts	0	0%	13	33%	26	67%
2018+ Deliverables								
A1	Critical bolting API 20 E/F replacement bolts ordered	List by rig % of bolts ordered	25	64%	8	21%	6	15%
A2	Critical bolting API 20 E/F replacement bolts installed	List by rig % of bolts installed/replaced	33	85%	6	15%	0	0%



Industry Commitment to Safety as a Core Value

Industry stands committed to continuous improvement in:

- **System reliability**
- **System integrity**
- **The total system of safety**

Industry stands committed to effectively addressing bolt issue through:

- **Research**
- **Standards and technical programs**
- **Quality assurance/quality control**
- **Collaboration with BSEE and stakeholders**

Update on Industry Activities on Subsea BOP Bolting

QUESTIONS?

Holly A. Hopkins

hopkinsh@api.org

American Petroleum Institute

1220 L Street, NW

Washington, DC 20005

202-682-8439

Links to More Information

- ❖ **Annual API Standards Plan**
<http://www.api.org/publications-standards-and-statistics/annual-standards-plan>
- ❖ **Free viewing of API standards referenced in U.S. regulations**
<http://publications.api.org/>
- ❖ **Catalog of Publications**
<http://www.api.org/products-and-services/standards/purchase>
- ❖ **Meetings & Training**
<http://www.api.org/meetings>
- ❖ **API Procedures for Standards Development**
<http://mycommittees.api.org/standards/Reference/API%20Procedures%20for%20Standards%20Development-2016.pdf>
- ❖ **API Format and Style Manual**
<http://mycommittees.api.org/standards/ecs/Shared Documents/Standards Development Tools/API Document Format and Style Guide - Jan. 2009.pdf>

ADDITIONAL SLIDES

API Standards Committees

- ❖ **Standards committees typically meet twice a year**
- ❖ **Subgroups (task groups, resource groups) meet as needed to progress work, often via conference calls or web meetings**
- ❖ **Balance between operators, manufacturers, contractors, service companies, and consultants**
- ❖ **API corporate membership is not a requirement for participation on API standards committees**

Standards Development Process

- ❖ **Developed using a consensus-based process (does not mean unanimity)**
- ❖ **Generally written for flexibility as performance-based documents**
- ❖ **Standards committees decide when to develop a new standard**

Standards Development Process

- ❖ **All standards balloting is done via the web**
- ❖ **All comments must be considered and the resolution documented**
- ❖ **One vote per company on standards ballots**
- ❖ **Voting rights are determined by level of participation**

Compliance with Industry Standards

- ❖ All API documents are voluntary unless imposed by regulation, contract, or company procedures
- ❖ The document type does not determine compliance

Prescriptive vs. Performance-based Standards

- ❖ **Prescriptive standard – typically prescribes materials, design, and construction methods without stating goals and objectives (“how”)**
- ❖ **Performance-based standard – expresses desired characteristics of the final product, service, or activity rather than requirements for the processes to produce it (“what”)**

Prescriptive vs. Performance-based Standards

- ❖ **API generally prefers performance-based**
- ❖ **Advantages of performance-based standards**
 - **Allows earlier use of new technology**
 - **Encourages innovation**
 - **Goals and objectives are clearly stated**
 - **Development and maintenance requires less effort**

Prescriptive vs. Performance-based Standards

- ❖ **A mixed approach may be necessary depending on whether or not the requirements meet the goals and objectives of the standard**
- ❖ **Prescriptive requirements may be necessary for safety and interchangeability – e.g. thread sizes for connections, pressure testing requirements, etc.**
- ❖ **Prescriptive requirements should be considered when performance-based requirements lead to costly and complicated testing procedures**

Document Designations

- ❖ **Specifications**
- ❖ **Standards**
- ❖ **Recommended Practices**
- ❖ **Bulletins**
- ❖ **Technical Reports**

Document Designations

- ❖ **Specifications** – Documents written to facilitate communications between purchasers, manufacturers, and/or service suppliers
- ❖ **Standards** – Documents that combine elements of both specifications and recommended practices

Document Designations

- ❖ **Recommended Practices** – Documents that communicate proven industry practices; RPs may include both mandatory and non-mandatory provisions
- ❖ **Bulletins & Technical Reports** – Documents that convey technical information on a specific subject or topic and are generally issued on a one time-basis



Interagency Bolt Action Team (IBAT) Charter

Background

The Bureau of Safety and Environmental Enforcement (BSEE), in response to reports of subsea critical drill through equipment bolt (fastener) failures directed its Quality Control-Failure Incident Team (QC-FIT) to conduct several technical evaluations related to the design, manufacture, material selection, and performance of subsea bolt failures¹. BSEE encouraged the oil and gas industry to address offshore fastener safety concerns that pose a significant risk to both personnel safety and the environment. Recently, the BSEE Director expressed concerns about the oil and gas industry's speed with regard to addressing the subsea fastener failure issues. As a result, an Interagency Bolt Action Team (IBAT) was formed for the purpose of promoting collaboration among federal partners in order to share expertise, information, data, experiences, and best practices on fastener safety and recommend possible solutions to resolve critical equipment fastener failures.

Introduction

The mission of the Interagency Bolt Action Team is to broadly communicate, share knowledge, offer expertise about fastener performance; conduct research; document failure history; evaluate fastener equipment failure data; assess fastener equipment manufacture and applications (materials, environment, and quality); and recommend guidelines and/or standards for fastener use on critical equipment.

Whereas, BSEE has a concern with fastener failures in a subsea environment and is interested in developing partnerships with other federal agencies for the purpose of sharing research and expertise; and

Whereas, BSEE is a federal agency that regulates and oversees the offshore oil and gas industry and wants to increase the safety throughout the industry; and

Whereas, industries outside the offshore oil and gas industry have expertise in fastener performance and similar fastener concerns; and

Whereas, this IBAT charter will establish a mechanism for the participating parties to share information and expertise relating to bolt design, manufacturing, installation, and performance; and

Now therefore, BSEE establishes the Interagency Bolt Action Team (IBAT) to address the fastener failure concerns.

Goals

The goals of the IBAT are:

¹ Fasteners are considered any hardware that mechanically joins two or more objects together, e.g. bolts, nuts, studs, etc.

1. Form a diverse repository of information related to fastener failures that can be used by all agencies to make better informed decisions.
2. To assess fastener materials, performance and best practices throughout multiple industries.
3. Collectively share and review the following: design; materials; coatings; installation; quality assurance (QA)/Quality Control (QC); inspection; monitoring; maintenance; environment; failure data; research; failure testing and analysis; performance; manufacture processes; regulations; industry standards; human factors; and best practices.
4. Review fastener performance and qualify the use of fasteners in various environments across industries.
5. Determine the various fastener standards that exist in the various industries.

Value

The IBAT will allow the participating agencies with expertise from multiple industries to communicate periodically in order to share their knowledge of various incidents and failures, and make a unified determination influencing the best practices (planning, designing, construction) for fasteners application in different environments. The team will also work together to characterize the operating environment for bolt usage and the possible impacts the environment has on bolt integrity. This sharing of information and characterization of environments will benefit all participating agencies by increasing the available information for evaluating that a bolt design is fit for service for the proposed operating environment. This effort would encourage the use of performance-based best operating practices to promote operational safety and protect the environment. The data would provide industry information about performance trends allowing each corresponding industry to benchmark their performance against aggregate relevant data.

Deliverables

BSEE will serve as the secretariat for this team and maintain the IBAT Action Plan. The IBAT deliverables include, but are not limited to the following:

- Meeting summaries and roster of participating agencies.
- Record of past and current known bolt failures; lessons learned; and future research studies with IBAT members including the following:
 - Fastener failure data; root cause analyses (RCA) reports; raw data; fastener failure trends; fastener failure history based on fastener type, material, and environment; fastener test procedures and test data; fastener performance; and best practices;
- Establishing connections among subject matter experts with knowledge of relevant bolt projects;
- Determining the gaps in knowledge related to bolt design, manufacturing, and environmental impacts;
- Providing a review of industry standards and best practices across industries;
 - BSEE has a contract with Argonne National Laboratories (ANL) to do an industry standards requirements gap analysis; and
- Development of consistent/standard material planning requirements (MPR) for bolts

Meetings

The IBAT will meet quarterly. Meeting summaries will be shared with each participating agency.

Amendments and Review

The terms of this charter may be amended by written request to the Deputy Director of BSEE. This team shall be in effect through December 31st, 2018.

IBAT Agency Capabilities and Subject Matter Expert(s)

Each IBAT member will provide a summary statement of their agency's relevant fastener expertise, experience, capabilities and limitations (e.g. restrictions on providing guidance for industry standards).

Each IBAT agency member will designate at least one subject matter expert (SME) who will participate in IBAT meetings, telecoms, initiatives, etc. A biography or resume outlining the designated SME's experience, knowledge, and expertise should be provided.

Use of Name

Agencies are free to identify themselves as participants on the IBAT. The participating parties agree not to use each others names in any advertising or other form of publicity without the prior written consent of that participating party.

Resolution

With this charter, BSEE establishes the Interagency Bolt Action Team (IBAT), bringing several federal agencies together to share information and knowledge of best practices for fastener safety throughout the regulated industries.

Margaret Schneider
Acting Director
Bureau of Safety and Environmental Enforcement

Date

Conversation Contents

First SafeOCS Report

Attachments:

/36. First SafeOCS Report/1.1 image001.jpg
/36. First SafeOCS Report/2.1 image001.jpg
/36. First SafeOCS Report/3.1 image001.jpg

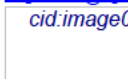
Holly Hopkins <hopkinsh@api.org>

From: Holly Hopkins <hopkinsh@api.org>
Sent: Wed Jul 12 2017 15:23:00 GMT-0600 (MDT)
To: "Tom Lillie (Thomas.Lillie@bsee.gov)" <Thomas.Lillie@bsee.gov>, "preston.beard@bsee.gov" <preston.beard@bsee.gov>
Subject: First SafeOCS Report
Attachments: image001.jpg

Guys,

I should have asked Scott about this when I saw him this week at the API Safe Lifting Conference, but I forgot. COS/API has received a request from BSEE for us to host a meeting in Houston for BSEE/BTS to roll-out their first SafeOCS written report. This report details the 2016 equipment failure data they received in response to the Well Control Rule. BSEE has suggested that perhaps the meeting could take place the day following the COS Forum scheduled for September 19-20. I wanted to make sure Scott was on board with this idea, see if anyone had asked him how he would like the first report rolled out, etc. I'd be happy to talk to one of you about this in more detail or with Scott. I just want to make sure we are all on the same page and we (API/COS) respond to this request appropriately.

Thanks,

Holly A. Hopkins
Sr. Policy Advisor, Upstream
American Petroleum Institute
1220 L Street, NW
Washington, DC 20005
202-682-8439 Tel
hopkinsh@api.org


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"Lillie, Thomas" <thomas.lillie@bsee.gov>

From: "Lillie, Thomas" <thomas.lillie@bsee.gov>
Sent: Tue Jul 18 2017 16:13:46 GMT-0600 (MDT)
To: Holly Hopkins <hopkinsh@api.org>
CC: "preston.beard@bsee.gov" <preston.beard@bsee.gov>, Eileen Angelico <eileen.angelico@bsee.gov>
Subject: Re: First SafeOCS Report
Attachments: image001.jpg

we will work with September 21 as the day for the event in Houston as we discussed.


Tom Lillie
Chief of Staff
Bureau of Safety and Environmental Enforcement
(202) 208-6286
thomas.lillie@bsee.gov

On Wed, Jul 12, 2017 at 5:23 PM, Holly Hopkins <hopkinsh@api.org> wrote:

Guys,

I should have asked Scott about this when I saw him this week at the API Safe Lifting Conference, but I forgot. COS/API has received a request from BSEE for us to host a meeting in Houston for BSEE/BTS to roll-out their first SafeOCS written report. This report details the 2016 equipment failure data they received in response to the Well Control Rule. BSEE has suggested that perhaps the meeting could take place the day following the COS Forum scheduled for September 19-20. I wanted to make sure Scott was on board with this idea, see if anyone had asked him how he would like the first report rolled out, etc. I'd be happy to talk to one of you about this in more detail or with Scott. I just want to make sure we are all on the same page and we (API/COS) respond to this request appropriately.

Thanks,

Holly A. Hopkins
Sr. Policy Advisor, Upstream
American Petroleum Institute
1220 L Street, NW
Washington, DC 20005
202-682-8439 Tel
hopkinsh@api.org


This transmission contains information that is privileged and confidential and is intended solely for use of the individual(s) listed above. If you received the communication in error, please notify me immediately. Any dissemination or copying of this communication by anyone other than the individual(s) listed above is prohibited.

Holly Hopkins <hopkinsh@api.org>

From: Holly Hopkins <hopkinsh@api.org>
Sent: Thu Jul 20 2017 10:12:21 GMT-0600 (MDT)
To: "Lillie, Thomas" <thomas.lillie@bsee.gov>
CC: "preston.beard@bsee.gov" <preston.beard@bsee.gov>, Eileen Angelico <eileen.angelico@bsee.gov>
Subject: RE: First SafeOCS Report
Attachments: image001.jpg

Tom,

After speaking with Michael Pittman today, you can release September 21 from Scott's calendar. There was miscommunication about what was being asked, planned, etc. The rollout of the SafeOCS report will take place in late August. Any industry meeting will take place later in the fall and will be technical with BSEE staff.

Thanks,
Holly

From: Lillie, Thomas [<mailto:thomas.lillie@bsee.gov>]
Sent: Tuesday, July 18, 2017 6:14 PM
To: Holly Hopkins
Cc: preston.beard@bsee.gov; Eileen Angelico
Subject: Re: First SafeOCS Report


we will work with September 21 as the day for the event in Houston as we discussed.

Tom Lillie
Chief of Staff
Bureau of Safety and Environmental Enforcement
(202) 208-6286
thomas.lillie@bsee.gov

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Thomas Lillie <thomas.lillie@bsee.gov>

From: Thomas Lillie <thomas.lillie@bsee.gov>
Sent: Thu Jul 20 2017 18:41:46 GMT-0600 (MDT)
To: Holly Hopkins <hopkinsh@api.org>
CC: "preston.beard@bsee.gov" <preston.beard@bsee.gov>, Eileen Angelico <eileen.angelico@bsee.gov>
Subject: Re: First SafeOCS Report

Ok. Thanks

Tom Lillie
Chief of Staff, BSEE
(202) 208-6286

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Conversation Contents

Re: 2017 Deepwater Technical Symposium: Presentation Schedule Released!

Attachments:

/35. Re: 2017 Deepwater Technical Symposium: Presentation Schedule Released!/2.1 BIC August 2017 .pdf
/35. Re: 2017 Deepwater Technical Symposium: Presentation Schedule Released!/5.1 BIC August 2017 .pdf

Eileen Angelico <eileen.angelico@bsee.gov>

From: Eileen Angelico <eileen.angelico@bsee.gov>
Sent: Fri Aug 18 2017 09:26:58 GMT-0600 (MDT)
To: Lori LeBlanc <lori@lorileblancllc.com>
CC: "Lillie, Thomas" <thomas.lillie@bsee.gov>, preston.beard@bsee.gov
Subject: Re: 2017 Deepwater Technical Symposium: Presentation Schedule Released!

Thanks Lori, we will be a close group.

We appreciate your work on making this happen.

Eileen

Sent from my iPhone

On Aug 18, 2017, at 11:24 AM, Lori LeBlanc <lori@lorileblancllc.com> wrote:

Eileen,

Good morning. Thanks for your list. The room can fit between 21-25 folks so we may be a bit tight but we will make it work. Below is a list of expected attendees from our Offshore Committee:

Lori LeBlanc - Director, LMOGA Offshore Committee
Bryan Wesley - ExxonMobil
Jeff Kopesky - ExxonMobil
Amber Tierce - Chevron
Sandi Fury - Chevron
Felicia Fredrick - Chevron
Grant Black - Chevron
Karl Connor - BP
Larry Thomas - BP
Joe Leimkuhler - Llog
Bruce Cooley - Llog
Rick Bullock - Llog
Selby Bush - BHP
Kevin Simpson - Shell
Ruth Perry - Shell
Kevin Bruce - Fieldwood
Evan Zimmerman - OOC
Greg Southworth - OOC

Thank you,

Lori

On August 17, 2017 at 1:50 PM "Angelico, Eileen" <eileen.angelico@bsee.gov> wrote:

Thanks Lori for the information.

This is useful; the other item that would be helpful is a list of expected attendees by name.

I anticipate BSEE's group to include the following:

Scott A. Angelle
Lars Herbst
Mike Prendergast
Preston Beard
Eileen Angelico

Please let me know if there is a space limitation that would require us to reduce the size of our group.

We look forward to a productive meeting.

Thanks,

Eileen

Eileen P. Angelico, APR
Acting Chief, Office of Public Affairs
Bureau of Safety and Environmental Enforcement
(202) 208-7746 office
(504) 654-7840 mobile

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Lori: LAMOGA is on the schedule for 22 August at 5:30 PM CT. I'll keep it on the schedule. Tom

Tom Lillie
Chief of Staff
Bureau of Safety and Environmental Enforcement
(202) 208-6286
thomas.lillie@bsee.gov

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To: Eileen Angelico <eileen.angelico@bsee.gov>
Cc: "Lillie, Thomas" <thomas.lillie@bsee.gov>
Date: August 1, 2017 at 1:24 PM
Subject: Re: 2017 Deepwater Technical Symposium: Presentation Schedule Released!

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Thanks again,

Lori

On July 23, 2017 at 3:03 PM Eileen Angelico
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Scott is speaking at the Plenary Session of the Deepwater Technology Symposium which is scheduled from 3:45 - 4:45 pm on Aug. 22nd at the New Orleans Convention Center. So we will need time to get to the meeting location.

Please let know if you need any additional information. We look forward to a good discussion.

Thanks,

Eileen

Eileen P. Angelico, APR
Acting Chief, Office of Public Affairs
Bureau of Safety and Environmental Enforcement (202)
208-7746 office (504) 654-7840 mobile

Sent from my iPhone

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Thank you,

Lori

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Regards, Tom

Tom Lillie
Chief of Staff
Bureau of Safety and Environmental
Enforcement
(202) 208-6286
thomas.lillie@bsee.gov

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I spoke to Chris John (LMOGA President) and we would like to stick with the dinner with the LMOGA Board of Directors; however, if possible, I would like to meet with Scott at 4pm before the dinner. We are still working on a location for the dinner.

Thank you,

Lori

On July 17, 2017 at 5:10 PM "Lillie, Thomas" <thomas.lillie@bsee.gov> wrote:

We may be able to have the meeting sooner in the day. He speaks around 3:00 and could meet at 4:00 rather than waiting for dinner if that works. I was not aware of that possibility we we last discussed it. Will that work?

Tom Lillie
Chief of Staff
Bureau of Safety
and Environmental
Enforcement
(202) 208-6286
thomas.lillie@bsee.gov

On Mon, Jul 17, 2017 at 4:15 PM, Lori LeBlanc <lori@lorileblanccllc.com> wrote:

Hi Tom,

I just
want to

confirm
that we
have set
the
LMOGA
dinner
meeting
for the
evening
of August
22nd in
NOLA
(after the
DW
Technical
Symposium).
The
location
in NOLA
is TBD
but I
wanted
to
confirm
before
we work
out the
details.

Thank
you,

Lori

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Original
Message

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From:
Linda
Tabor
<linda.tabor@nicholls.edu>
To:
'Lori
LeBlanc'
<lori@lorileblancllc.com>
Date:
July
10,
2017
at
3:21
PM
Subject:
FW:
2017
Deepwater
Technical
Symposium:
Presentation
Schedule
Released!

just
fyi

Linda Tabor

[South
Louisiana
Economic
Council,
Inc.](#)

[LA1
Coalition,
Inc.](#)

[Restore
or
Retreat,
Inc.](#)

[Gulf
Economic
Survival
Team,
Inc.](#)

Post
Office
Box
2048/NSU

Thibodaux,
LA
70310

P:
985.448.4485

F:
985.448.4486

From:
2017
Deepwater
Technical
Symposium
[mailto:info@deepwaternola.org
]

Sent:
Monday,
July
10,
2017
1:55
PM

To:
linda.tabor@nicholls.edu

Subject:
2017
Deepwater
Technical
Symposium:
Presentation
Schedule
Released!

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August 21-23, 2017 | New Orleans | www.deepwaternola.org



Presenting the 2017 DWTS
[Technical Session Schedule](#)

REGISTRATION

Learn about the presenting topics and companies for each of the technical sessions. Due to the release of the schedule, early bird registration has been extended to

[Friday, July 14!](#)

More information can be found at www.deepwaternola.org

Early bird rate available
Friday, July 14



Presenting the 2017 DWTS Keynote and Plenary Session Speakers!

Tuesday, August 22 Luncheon Keynote

Imran Khan, Wood Mackenzie

Deepwater Gulf of Mexico: Production growing but can investment grow?

Imran Khan, CFA, joined Wood Mackenzie in 2013 and is currently the Senior Manager of the Deepwater Gulf of Mexico Upstream Oil and Gas research



team. Imran and his team focus on developing asset valuations, publishing insights on regional trends and advising on consulting projects. Prior to

joining Wood Mackenzie, Imran worked as a Senior Analyst with an energy focused buy-side investment fund in Houston.

ACCOMMODATIONS

The 21st Annual Gulf of Mexico Deepwater Technical Symposium will be held at [New Orleans Doubletree by Hilton at the Convention Center](#)



Special [event room rate](#) is available for attendees!

Tuesday, August 22 Plenary Session

Scott Angelle, BSEE

US Offshore and BSEE - The Way Forward

Scott A. Angelle is Director, Bureau of Safety and Environmental Enforcement (BSEE), Department of the Interior. He is responsible for promoting safety, protecting the environment and conserving resources through the regulatory oversight and enforcement of energy industry operations on the U.S. Outer Continental Shelf. He joined the bureau on May 24, 2017, following more than 30 years of reforming agencies and organizations in both the public and private sectors.



ASSOCIATED EVENTS

Enjoy networking and further professional development at associated events surrounding Deepwater Technical Symposium

[NOGS Geoscience Seminar](#)

[AADE Fin Feather Fur Festival \(F5\)](#)

[SPE YP Oilfield Trivia Challenge](#)

Wednesday, August 23 Luncheon Keynote

Joe Leimkuhler, LLOG Exploration

Can the U.S. Dominate Energy?

Joe Leimkuhler is the Vice President of Drilling for LLOG Exploration based in Covington, Louisiana. Joe is responsible for all Drilling and Completion Operations and Well Engineering for LLOG. Prior to joining LLOG in early 2012 Joe was the Offshore Well Delivery Manager for Shell International E&P Co., (SIEP) covering all Gulf of Mexico well operations for all Semi-Submersible and Drillships.



TECHNICAL SESSIONS

The technical sessions will feature presentations covering a wide range of deepwater topics including

More information can be found at www.deepwaternola.org

Emerging Technology

[Drilling Technology](#)
[Geoscience](#)
[Production Systems](#)
[Reservoir Engineering & Economics](#)
[Well Completion & Intervention Technology](#)
[HS&E & Regulatory](#)
[Pipelines & Infrastructure](#)

Dear Lori,

I'd like to invite you to reserve August 21-23, 2017 for the 21st Annual Deepwater Technical Symposium. The Symposium is a joint effort between the three local professional societies:

[American Association of Drilling Engineers \(AADE\)](#)

[New Orleans Geological Society \(NOGS\)](#)

[Society of Petroleum Engineers Delta Section \(SPE\)](#)

2017 SPONSORS



While enduring a period of challenges across the industry caused by declining commodity prices, activity in Deepwater Gulf of Mexico remains high. Production is near record high levels due to the great technical work executed by you and your colleagues.

The overall goal of the Symposium is to share knowledge, best practices, new technologies, and process improvements with a focus on case studies. I urge you to continue developing the learning culture in our industry and knowledge sharing to successfully deliver the future of Deepwater Gulf of Mexico.

I look forward to seeing you at the Symposium in August.

Sincerely,

Sue Barth

Chairperson

2017 Deepwater Technical Symposium

www.deepwaternola.org

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YOUR PARTICIPATION GOES FURTHER

Proceeds from the Symposium are used to support scholarship and other educational efforts of the sponsoring societies.

Not only do these projects maintain an awareness of beneficial aspects of the oil business, they also help to the necessary skills that will help the young professionals enter the industry. Your support for Mexico Deepwater Technical Symposium helps insure their continued success.

Society of Petroleum
Engineers,
PO Box 52737, New
Orleans, LA 70512

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linda.tabor@nicholls.edu

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info@deepwaternola.org in
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No problem...We've had an overwhelming response and I know the group is looking forward to our visit. Also, I am attaching my August column in the Baton Rouge-based BIC publication for your reference.

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for dinner
if that
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possibility
we we
last
discussed
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Tom Lillie
Chief of
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Bureau
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(202)
208-6286
thomas.lillie@bsee.gov

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the
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Thank
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Original
Message

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From:
Linda
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<linda.tabor@nicholls.edu>
To:
'Lori
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<lori@lorileblancllc.com>
Date:
July
10,
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at
3:21
PM
Subject:
FW:
2017
Deepwater
Technical
Symposium:
Presentation
Schedule
Released!

just
fyi

**Linda
Tabor**

[South
Louisiana
Economic
Council,
Inc.](#)

[LA1
Coalition,
Inc.](#)

[Restore
or
Retreat,
Inc.](#)

[Gulf
Economic
Survival
Team,
Inc.](#)

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Office
Box
2048/NSU

Thibodaux,

LA
70310

P:
985.448.4485

F:
985.448.4486

From:
2017
Deepwater
Technical
Symposium
[mailto:info@deepwaternola.org]
]
Sent:
Monday,
July
10,
2017
1:55
PM
To:
linda.tabor@nicholls.edu
Subject:
2017
Deepwater
Technical
Symposium:
Presentation
Schedule
Released!

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August 21-23, 2017 | New Orleans | www.deepwaternola.org



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[Technical Session Schedule!](#)

REGISTRATION

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[Friday, July 14!](#)

More information can be found at www.deepwaternola.org.

**Early bird rate
Friday, July 14!**



**Presenting the 2017 DWTS Keynote and
Plenary Session Speakers!**

Tuesday, August 22 Luncheon Keynote

Imran Khan, Wood Mackenzie

***Deepwater Gulf of Mexico: Production
growing but can investment grow?***

Imran Khan, CFA, joined Wood Mackenzie in 2013 and is currently the Senior Manager of the Deepwater Gulf of Mexico Upstream Oil and Gas research



ACCOMMODATIONS

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Special [event room](#) for attendees!

Tuesday, August 22 Plenary Session

Scott Angelle, BSEE

US Offshore and BSEE - The Way Forward

Scott A. Angelle is Director, Bureau of Safety and Environmental Enforcement (BSEE), Department of the Interior. He is responsible for promoting safety, protecting the environment and conserving resources through the regulatory oversight and enforcement of energy industry operations on the U.S. Outer Continental Shelf. He joined the bureau on May 24, 2017, following more than 30 years of reforming agencies and organizations in both the public and private sectors.



ASSOCIATED

Enjoy networking and professional development associated events at Deepwater Technical

[NOGS Geoscience](#)

[AADE Fin Feather Festival \(F5\)](#)

[SPE YP Oilfield Tri](#)

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**Drilling Technology
Geoscience
Production Systems
Reservoir Engineering
Economics
Well Completion & Technology
HS&E & Regulatory
Pipelines & Infrastructure**



2017 SPONSORS

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While enduring a period of challenges across the industry caused by declining commodity prices, activity in Deepwater Gulf of Mexico remains high. Production is near record high levels due to the great technical work executed by you and your colleagues.

The overall goal of the Symposium is to share knowledge, best practices, new technologies, and process improvements with a focus on case studies. I urge you to continue developing the learning culture in our industry and knowledge sharing to successfully deliver the future of Deepwater Gulf of Mexico.

GOLD

[Lloyd's Register](#)

[Newpark Drilling Fluids](#)

I look forward to seeing you at the Symposium in August.

[Stabil Drill](#)

[TAM International](#)

Sincerely,

[BRONZE](#)

[CETCO Energy Services](#)

Sue Barth

Chairperson

2017 Deepwater Technical Symposium

YOUR
PARTICIPATION
GOES FURTHER

www.deepwaternola.org

Proceeds from the Symposium are used to support scholarship and other educational efforts of the sponsoring society.

Not only do these presentations maintain an awareness of the beneficial aspects of the oil and gas business, they also provide the necessary skills and knowledge for the young professional in the industry. Your support of the Mexico Deepwater Technical Symposium helps in its continued success.

Society of Petroleum
Engineers,
PO Box 52737, New
Orleans, LA 70512

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linda.tabor@nicholls.edu

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info@deepwaternola.org in
collaboration with

Constant Contact 
[Try it free today](#)

Lori LeBlanc <lori@lorileblancllc.com>

From: Lori LeBlanc <lori@lorileblancllc.com>
Sent: Mon Aug 21 2017 08:38:29 GMT-0600 (MDT)
To: Eileen Angelico <eileen.angelico@bsee.gov>
CC: "Lillie, Thomas" <thomas.lillie@bsee.gov>, <preston.beard@bsee.gov>
Subject: Re: 2017 Deepwater Technical Symposium: Presentation Schedule Released!

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Sandi Fury - Chevron
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Grant Black - Chevron
Karl Connor - BP
Larry Thomas - BP
Joe Leimkuhler - Llog
Bruce Cooley - Llog
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Eileen

Eileen P. Angelico, APRA Acting Chief, Office of Public Affairs
Bureau of Safety and Environmental Enforcement (202) 208-7746 office (504) 654-7840 mobile

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Tom Lillie
Chief of Staff
Bureau of Safety and
Environmental Enforcement
(202) 208-6286
thomas.lillie@bsee.gov

On Thu, Jul 20, 2017 at 10:35
AM, Lori LeBlanc
<lori@lorileblanccllc.com> wrote:

Hi Tom,

I spoke to Chris
John (LMOGA
President) and we
would like to stick
with the dinner with
the LMOGA Board
of Directors;
however, if possible,
I would like to meet
with Scott at 4pm
before the dinner.

We are still working
on a location for the
dinner.

Thank you,

Lori

On July
17, 2017
at 5:10
PM
"Lillie,
Thomas"
<thomas.lillie@bsee.gov>
wrote:

We may
be able
to have
the
meeting
sooner in
the day.
He
speaks
around
3:00 and
could
meet at
4:00
rather
than
waiting
for dinner
if that
works. I
was not
aware of
that
possibility
we we
last
discussed
it. Will
that
work?

Tom Lillie
Chief of
Staff
Bureau
of Safety
and
Environmental
Enforcement

(202)
208-6286
thomas.lillie@bsee.gov

On Mon,
Jul 17,
2017 at
4:15 PM,
Lori
LeBlanc
<lori@lorileblancllc.com>
wrote:

Hi
Tom,

I
just
want
to
confirm
that
we
have
set
the
LMOGA
dinner
meeting
for
the
evening
of
August
22nd
in
NOLA
(after
the
DW
Technical
Symposium).
The
location
in
NOLA
is
TBD
but
I
wanted
to
confirm
before
we
work
out
the
details.

Thank
you,

Lori

-
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-
-
-
-
-
-
-
-

Original
Message

-
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-
-
-
-
-

-
From:
Linda
Tabor
<linda.tabor@nicholls.edu>
To:
'Lori
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<lori@lorileblancllc.com>
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July
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3:21
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just
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**Linda
Tabor**

[South
Louisiana
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Council,
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[LA1
Coalition,
Inc.](#)

[Restore
or
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[Gulf
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Chairperson

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One hour, 5:30 - 6:30pm.

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3:00
and
could
meet
at
4:00
rather
than
waiting
for
dinner
if
that
works.
I
was
not
aware
of
that
possibility
we
we
last
discussed
it.
Will
that
work?

Tom
Lillie
Chief
of
Staff
Bureau
of
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and
Environmental
Enforcement
(202)
208-
6286
thomas.lillie@bsee.gov

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we

Thank
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—

From: Linda Tabor
<linda.tabor@nicholls.edu>
To: 'Lori LeBlanc'
<lori@lorileblancllc.com>
Date: July 10, 2017
at 3:21 PM
Subject: FW: 2017 Deepwater Technical Symposium:

Presentation
Schedule
Released!

just
fyi

**Linda
Tabor**

[South
Louisiana
Economic
Council,
Inc.](#)

[LA1
Coalition,
Inc.](#)

[Restore
or
Retreat,
Inc.](#)

[Gulf
Economic
Survival
Team,
Inc.](#)

Post
Office
Box
2048/NSU

Thibodaux,
LA
70310

P:
985.448.4485

F:
985.448.4486

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]

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More information can be found at www.deepwatermola.org



Presenting the 2017 DWTS Keynote and Plenary Session Speakers!

Tuesday, August 22 Luncheon Keynote

ACCOMMODATIONS

Imran Khan, Wood Mackenzie

Deepwater Gulf of Mexico: Production growing but can investment grow?

Imran Khan, CFA, joined Wood Mackenzie in 2013 and is currently the Senior Manager of the Deepwater Gulf of Mexico Upstream Oil and Gas research



team. Imran and his team focus on developing asset valuations, publishing insights on regional trends and advising on consulting projects. Prior to

The 21st Annual Deepwater Technology Conference will be held at [Ne Marriott at the](#)

joining Wood Mackenzie, Imran worked as a Senior Analyst with an energy focused buy-side investment fund in Houston.

Special [even](#) for attendees

Tuesday, August 22 Plenary Session

Scott Angelle, BSEE

US Offshore and BSEE - The Way Forward

Scott A. Angelle is Director, Bureau of Safety and Environmental Enforcement (BSEE), Department of the Interior. He is responsible for promoting safety, protecting the environment and conserving resources through the regulatory oversight and enforcement of energy industry operations on the U.S. Outer Continental Shelf. He joined the bureau on May 24, 2017, following more than 30 years of reforming agencies and organizations in both the public and private sectors.



ASSOCIATION

Enjoy networking with professional colleagues associated with Deepwater Technology

[NOGS Geos](#)

[AADE Financial Festival \(F5\)](#)

[SPE YP Oilfield](#)

Wednesday, August 23 Luncheon Keynote

Joe Leimkuhler, LLOG Exploration

Can the U.S. Dominate Energy?

Joe Leimkuhler is the Vice President of Drilling for LLOG Exploration based in Covington, Louisiana. Joe is responsible for all Drilling and Completion Operations and Well Engineering for LLOG. Prior to joining LLOG in early 2012 Joe was the Offshore Well Delivery Manager for Shell International E&P Co. (SIEP) covering all Gulf of

TECHNICAL SESSIONS

Mexico well operations for all
Semi-Submersible and Drillships.

More information can be
found at www.deepwaternola.org



The technical
presentation
of deepwater

Dear Lori,

I'd like to invite you to reserve August 21-23,
2017 for the 21st Annual Deepwater Technical
Symposium. The Symposium is a joint effort
between the three local professional societies:

[American Association of Drilling Engineers
\(AADE\)](http://www.aade.org)

[New Orleans Geological Society \(NOGS\)](http://www.nogsls.org)

[Society of Petroleum Engineers Delta Section
\(SPE\)](http://www.spe.org)

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Geoscience
Production
Reservoir Eng
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Pipelines &

2017 SPI



While enduring a period of challenges across the
industry caused by declining commodity
prices, activity in Deepwater Gulf of Mexico
remains high. Production is near record high
levels due to the great technical work executed by
you and your colleagues.

The overall goal of the Symposium is to share
knowledge, best practices, new technologies, and
process improvements with a focus on case
studies. I urge you to continue developing the
learning culture in our industry and knowledge
sharing to successfully deliver the future
of Deepwater Gulf of Mexico.

I look forward to seeing you at the Symposium in
August.

Sincerely,

Sue Barth

Chairperson

2017 Deepwater Technical Symposium

www.deepwaternola.org

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"Beard, Preston" <preston.beard@bsee.gov>

From: "Beard, Preston" <preston.beard@bsee.gov>
Sent: Mon Aug 27 2018 12:12:10 GMT-0600 (MDT)
To: Dorothy Tinker <dorothy.tinker@bsee.gov>
Subject: Fwd: 2017 Deepwater Technical Symposium: Presentation Schedule Released!
Attachments: BIC August 2017 .pdf

Forwarded conversation

Subject: Re: 2017 Deepwater Technical Symposium: Presentation Schedule Released!

From: **Eileen Angelico** <eileen.angelico@bsee.gov>
Date: Fri, Aug 18, 2017 at 11:26 AM
To: Lori LeBlanc <lori@lorileblancllc.com>
Cc: "Lillie, Thomas" <thomas.lillie@bsee.gov>, preston.beard@bsee.gov

Thanks Lori, we will be a close group.

We appreciate your work on making this happen.

Eileen

Sent from my iPhone

On Aug 18, 2017, at 11:24 AM, Lori LeBlanc <lori@lorileblancllc.com> wrote:

Eileen,

Good morning. Thanks for your list. The room can fit between 21-25 folks so we may be a bit tight but we will make it work. Below is a list of expected attendees from our Offshore Committee:

Lori LeBlanc - Director, LMOGA Offshore Committee
Bryan Wesley - ExxonMobil
Jeff Kopesky - ExxonMobil
Amber Tierce - Chevron
Sandi Fury - Chevron
Felicia Fredrick - Chevron
Grant Black - Chevron
Karl Connor - BP
Larry Thomas - BP
Joe Leimkuhler - Llog
Bruce Cooley - Llog
Rick Bullock - Llog
Selby Bush - BHP
Kevin Simpson - Shell
Ruth Perry - Shell
Kevin Bruce - Fieldwood
Evan Zimmerman - OOC
Greg Southworth - OOC

Thank you,

Lori

On August 17, 2017 at 1:50 PM "Angelico, Eileen" <eileen.angelico@bsee.gov> wrote:

Thanks Lori for the information.

This is useful; the other item that would be helpful is a list of expected attendees by name.

I anticipate BSEE's group to include the following:

Scott A. Angelle
Lars Herbst
Mike Prendergast
Preston Beard
Eileen Angelico

Please let me know if there is a space limitation that would require us to reduce the size of our group.

We look forward to a productive meeting.

Thanks,

Eileen

Eileen P. Angelico, APR
Acting Chief, Office of Public Affairs
Bureau of Safety and Environmental Enforcement
(202) 208-7746 office
(504) 654-7840 mobile

On Thu, Aug 17, 2017 at 1:34 PM, Lori LeBlanc <lori@lorileblanccllc.com> wrote:

Tom and Eileen,
We have a room reserved for this meeting next week - Delta Queen room at the New Orleans Downtown Marriott at the Convention Center. We expect about 15 LMOGA members to attend representing Chevron, Shell, BP, BHP, Llog, ExxonMobil and the Offshore Operators Committee. The draft agenda is attached. Let me know if you have any questions or need additional information.

Thank you,

Lori

On August 1, 2017 at 6:22 PM "Lillie, Thomas" <thomas.lillie@bsee.gov> wrote:

Lori: LAMOGA is on the schedule for 22 August at 5:30 PM CT. I'll keep it on the schedule. Tom

Tom Lillie
Chief of Staff
Bureau of Safety and Environmental Enforcement
(202) 208-6286
thomas.lillie@bsee.gov

On Tue, Aug 1, 2017 at 2:59 PM, Lori LeBlanc <lori@lorileblanccllc.com> wrote:

Tom - I received an Out of Office message from Eileen. Can you please confirm that we are all set with this meeting?

----- Original Message -----

From: Lori LeBlanc <lori@lorileblanccllc.com>
To: Eileen Angelico <eileen.angelico@bsee.gov>
Cc: "Lillie, Thomas" <thomas.lillie@bsee.gov>
Date: August 1, 2017 at 1:24 PM
Subject: Re: 2017 Deepwater Technical Symposium: Presentation Schedule Released!

Hi Eileen,

I looked at the Deepwater Technology Symposium web site and it indicates that the conference is being held at the Downtown Marriott at the Convention Center. We have a meeting room reserved at the Marriott hotel for our meeting with Scott. I just want to confirm one last time that we are still good to go before I finalize with the hotel and confirm with the LMOGA Offshore Committee. Please let me know.

Thanks again,

Lori

On July 23, 2017 at 3:03 PM Eileen Angelico
<eileen.angelico@bsee.gov> wrote:

Thanks Lori,

For planning purposes, we should consider 5:15pm or 5:30pm as a practical start time for the meeting depending on the location of the meeting site.

Scott is speaking at the Plenary Session of the Deepwater Technology Symposium which is scheduled from 3:45 - 4:45 pm on Aug. 22nd at the New Orleans Convention Center. So we will need time to get to the meeting location.

Please let know if you need any additional information. We look forward to a good discussion.

Thanks,

Eileen

Eileen P. Angelico, APRA Acting Chief, Office of Public Affairs Bureau of Safety and Environmental Enforcement (202) 208-7746 office (504) 654-7840 mobile

Sent from my iPhone

On Jul 23, 2017, at 11:26 AM, Lori LeBlanc <lori@lorileblanccllc.com> wrote:

Tom,

Per our conversation yesterday I will check with LMOGA to determine if a 5pm meeting on 8/22 will work for the group.

Thank you,

Lori

On July 22, 2017 at 2:26 PM "Lillie, Thomas" <thomas.lillie@bsee.gov> wrote:

Lori: I've added Eileen to the e-mail. She is developing the itinerary for this trip. We've made a few adjustments to the sequence. She has the new details. He is still speaking at the Deepwater Symposium on 22 August and may not be available until after 5:00 on that day. I will let her know what we discussed. It would be best if nothing is confirmed until we have a chance to get the latest from Eileen.
Regards, Tom

Tom Lillie
Chief of Staff
Bureau of Safety and Environmental Enforcement
(202) 208-6286
thomas.lillie@bsee.gov

On Thu, Jul 20, 2017 at 10:35 AM, Lori LeBlanc <lori@lorileblanccllc.com> wrote:

Hi Tom,

I spoke to Chris John (LMOGA President) and we would like to stick with the dinner with the LMOGA Board of Directors; however, if possible, I would like to meet with Scott at 4pm before the dinner. We are still working on a location for the dinner.

Thank you,

Lori

On July 17, 2017 at 5:10 PM "Lillie, Thomas" <thomas.lillie@bsee.gov> wrote:

We may be able to have the meeting sooner in the day. He speaks around 3:00 and could meet at 4:00 rather than

Tom Lillie
Chief of Staff
Bureau of Safety
and Environmental
Enforcement
(202) 208-6286
thomas.lillie@bsee.gov

Hi Tom,

Thank
you,

Lori

Original
Message

From:
Linda
Tabor
<linda.tabor@nicholls.edu>
To:

'Lori
LeBlanc'
<lori@lorileblancllc.com>
Date:
July
10,
2017
at
3:21
PM
Subject:
FW:
2017
Deepwater
Technical
Symposium:
Presentation
Schedule
Released!

just
fyi

**Linda
Tabor**

[South
Louisiana
Economic
Council,
Inc.](#)

[LA1
Coalition,
Inc.](#)

[Restore
or
Retreat,
Inc.](#)

[Gulf
Economic
Survival
Team,
Inc.](#)

Post
Office
Box
2048/NSU

Thibodaux,
LA
70310

P:
985.448.4485

F:
985.448.4486

From:
2017
Deepwater
Technical
Symposium
[mailto:info@deepwaterola.org]
Sent:
Monday,
July
10,
2017
1:55
PM
To:
linda.tabor@nicholls.edu
Subject:
2017
Deepwater
Technical
Symposium:
Presentata ion
Schedule
Released!

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August 21-23, 2017 | New Orleans | www.deepwaterola.org



**Presenting the 2017 DWTS
Technical Session Schedule!**

Learn about the presenting topics and companies for each of the technical sessions. Due to the release of the schedule, early bird registration has been extended to

Friday, July 14!

More information can be found at www.deepwaterola.org

REGISTRATION

**Early bird rate available
Friday, July 14!**



**Presenting the 2017 DWTS Keynote and
Plenary Session Speakers!**

Tuesday, August 22 Luncheon Keynote

Imran Khan, Wood Mackenzie

Deepwater Gulf of Mexico: Production growing but can investment grow?

Imran Khan, CFA, joined Wood Mackenzie in 2013 and is currently the Senior Manager of the Deepwater Gulf of Mexico Upstream Oil and Gas research



team. Imran and his team focus on developing asset valuations, publishing insights on regional trends and advising on consulting projects. Prior to

joining Wood Mackenzie, Imran worked as a Senior Analyst with an energy focused buy-side investment fund in Houston.

ACCOMMODATIONS

The 21st Annual Gulf of Mexico Deepwater Technical Symposium will be held at [New Orleans Doubletree by Marriott at the Convention Center](#)



Special [event room rate](#) is available for attendees!

Tuesday, August 22 Plenary Session

Scott Angelle, BSEE

US Offshore and BSEE - The Way Forward

Scott A. Angelle is Director, Bureau of Safety and Environmental Enforcement (BSEE), Department of the Interior. He is responsible for promoting safety, protecting the environment and conserving resources through the regulatory oversight and enforcement of energy industry operations on the U.S. Outer Continental Shelf. He joined the bureau on May 24, 2017, following more than 30 years of reforming agencies and organizations in both the public and private sectors.



ASSOCIATED EVENTS

Enjoy networking and further professional development at associated events surrounding the Deepwater Technical Symposium.

[NOGS Geoscience Seminar](#)

[AADE Fin Feather Fur Festival \(F5\)](#)

[SPE YP Oilfield Trivia Challenge](#)

Wednesday, August 23 Luncheon Keynote

Joe Leimkuhler, LLOG Exploration

Can the U.S. Dominate Energy?

Joe Leimkuhler is the Vice President of Drilling for LLOG Exploration based in Covington, Louisiana. Joe is responsible for all Drilling and Completion Operations and Well Engineering for LLOG. Prior to joining LLOG in early 2012 Joe was the Offshore Well Delivery Manager for Shell International E&P Co. (SIEP) covering all Gulf of Mexico well operations for all Semi-Submersible and Drillships.



TECHNICAL SESSIONS

The technical sessions will presentations covering a w of deepwater topics includi

More information can be found at www.deepwaternola.org.

Dear Lori,

I'd like to invite you to reserve August 21-23, 2017 for the 21st Annual Deepwater Technical Symposium. The Symposium is a joint effort between the three local professional societies:

[American Association of Drilling Engineers \(AADE\)](#)

[New Orleans Geological Society \(NOGS\)](#)

[Society of Petroleum Engineers Delta Section \(SPE\)](#)



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While enduring a period of challenges across the industry caused by declining commodity prices, activity in Deepwater Gulf of Mexico remains high. Production is near record high levels due to the great technical work executed by you and your colleagues.

The overall goal of the Symposium is to share knowledge, best practices, new technologies, and process improvements with a focus on case studies. I urge you to continue developing the learning culture in our industry and knowledge sharing to successfully deliver the future of Deepwater Gulf of Mexico.

I look forward to seeing you at the Symposium in August.

Sincerely,

Sue Barth

Chairperson

2017 Deepwater Technical Symposium

www.deepwaternola.org

[Message clipped]

From: Lori LeBlanc <lori@lorileblancllc.com>
Date: Fri, Aug 18, 2017 at 11:53 AM
To: Eileen Angelico <eileen.angelico@bsee.gov>
Cc: "Lillie, Thomas" <thomas.lillie@bsee.gov>, preston.beard@bsee.gov

No problem...We've had an overwhelming response and I know the group is looking forward to our visit. Also, I am attaching my August column in the Baton Rouge-based BIC publication for your reference.

...

[Message clipped]

From: Lori LeBlanc <lori@lorileblancllc.com>
Date: Mon, Aug 21, 2017 at 10:38 AM
To: Eileen Angelico <eileen.angelico@bsee.gov>
Cc: "Lillie, Thomas" <thomas.lillie@bsee.gov>, preston.beard@bsee.gov

Eileen,

Good morning. How much time do we have allocated for our meeting tomorrow?

Lori

...

[Message clipped]

From: Eileen Angelico <eileen.angelico@bsee.gov>
Date: Mon, Aug 21, 2017 at 10:40 AM
To: Lori LeBlanc <lori@lorileblancllc.com>
Cc: "Lillie, Thomas" <thomas.lillie@bsee.gov>, "preston.beard@bsee.gov" <preston.beard@bsee.gov>

Lori,

One hour, 5:30 - 6:30pm.

Eileen

Sent from my iPhone

...

[Message clipped]

Preston Beard
Advisor, Office of the Director
Bureau of Safety and Environmental Enforcement
(202) 208-3976 (o)
(571) 585-7001 (c)
preston.beard@bsee.gov

Conversation Contents

Attendees for TOPCO Meeting on Monday at 4pm

Lori LeBlanc <lori@lorileblancllc.com>

From: Lori LeBlanc <lori@lorileblancllc.com>
Sent: Thu Dec 14 2017 13:22:16 GMT-0700 (MST)
To: "Lillie, Thomas" <thomas.lillie@bsee.gov>, <preston.beard@bsee.gov>
Subject: Attendees for TOPCO Meeting on Monday at 4pm

Tom and Preston,

Below are the attendees for our meeting with Director Angelle on Monday, December 18 at 4pm.

Amanda Thompson, Partner, TOPCO Offshore, LLC
David "Bubba" Monico, Partner, TOPCO Offshore, LLC
Cory Kief, Business Development, Crosby Tugs
David Fitzgerald, Marketing, Crosby Tugs
Lori LeBlanc, President, Lori LeBlanc, LLC

More information about TOPCO Offshore, LLC can be found on their web site at <http://www.topcooffshore.com/>

Please confirm the room number for our meeting.

Thank you,

Lori LeBlanc
Lori LeBlanc, LLC
985.209.7932
lori@lorileblancllc.com

Lori LeBlanc <lori@lorileblancllc.com>

From: Lori LeBlanc <lori@lorileblancllc.com>
Sent: Fri Dec 15 2017 08:17:52 GMT-0700 (MST)
To: "Lillie, Thomas" <thomas.lillie@bsee.gov>, <preston.beard@bsee.gov>
Subject: Re: Attendees for TOPCO Meeting on Monday at 4pm

Please note, Andy Clifford with TOPCO Offshore will also attend our meeting on Monday.

Have a great weekend!

Lori

On December 14, 2017 at 3:22 PM Lori LeBlanc <lori@lorileblancllc.com> wrote:

Tom and Preston,

Below are the attendees for our meeting with Director Angelle on Monday, December 18 at 4pm.

Amanda Thompson, Partner, TOPCO Offshore, LLC
David "Bubba" Monico, Partner, TOPCO Offshore, LLC
Cory Kief, Business Development, Crosby Tugs
David Fitzgerald, Marketing, Crosby Tugs
Lori LeBlanc, President, Lori LeBlanc, LLC

More information about TOPCO Offshore, LLC can be found on their web site at <http://www.topcooffshore.com/>

Please confirm the room number for our meeting.

Thank you,

Lori LeBlanc
Lori LeBlanc, LLC
985.209.7932
lori@lorileblancllc.com

Conversation Contents

Speaking Request for LMOGA Meeting on Feb 28

Lori LeBlanc <lori@lorileblancllc.com>

From: Lori LeBlanc <lori@lorileblancllc.com>
Sent: Thu Feb 01 2018 06:58:28 GMT-0700 (MST)
To: Scott Angelle <scott.angelle@bsee.gov>, "Lillie, Thomas" <thomas.lillie@bsee.gov>
CC: <preston.beard@bsee.gov>
Subject: Speaking Request for LMOGA Meeting on Feb 28

Director Angelle,

It is my understanding you have a conflict for our LMOGA Offshore Committee meeting on February 28th in New Orleans. As such, we respectfully request BSEE leadership to speak at the LMOGA Offshore Committee Meeting to be held at 3:30pm Central at the Windsor Court Hotel. The session is 1.5 hours long of which we can allocate the entire session to BSEE or we can allocate 1/2 of the session to BSEE and also request BOEM to speak as well. Please let me know if you can provide leadership from BSEE to speak at our upcoming meeting and how much time would be appropriate for their presentation. We are finalizing the agenda details to circulate to the LMOGA members; therefore your prompt attention to this matter is greatly appreciated.

Thank you,

Lori LeBlanc
Louisiana Mid-Continent Oil & Gas Association
Lori@lorileblancllc.com
985.209.7932